



STAKEHOLDER ACTION PLAN:
VASQUEZ BOULEVARD/I-70 SUPERFUND SITE

Assessment, Findings, and Recommendations

Submitted by:

George Weber

Under Subcontract with:

SUMMIT Technical Resources

Submitted to:

**VB/I-70 Program Site Manager,
Region VIII EPA**

June 16, 2005



GEORGE WEBER, INC.
ENVIRONMENTAL

Victor Ketellapper, VB/I-70 Site Program Manager
Region VIII EPA
999 18th Street, Suite 500

June 16, 2005

Re: Final Report: Stakeholder Action Plan: Vasquez Boulevard/I-70 Superfund Site: Assessment, Findings, and Recommendations

Dear Mr. Ketellapper:

I am pleased to submit this document as the final report for the 'Stakeholder Action Plan: Vasquez Boulevard/I-70 Superfund Site: Assessment, Findings, and Recommendations'.

As we discussed, I will provide an electronic copy of this report to you and the spreadsheet of stakeholders (individuals X affiliations) noted in the text.

This report, in conjunction with the presentation I made on May 26, 2005 to the Program Managers and supporting agency staff of the analysis and recommendations concludes the work under Task 5 – Stakeholder Action Plan, 'Environmental Advisory Services Community Involvement Plan Vasquez Boulevard/I-70 Superfund Site which I performed as a subcontractor to SUMMIT Technical Resources, Inc.

Please do not hesitate contacting me if you have any questions.

Thank you for the opportunity to be of assistance.

Sincerely,

George Weber, President
George Weber, Inc.

CC to: Steve Paris, Project Manager, SUMMIT Technical Resources, Inc.



EXECUTIVE SUMMARY

Purpose and Background

The general purpose of the assessment is to develop a better understanding of the stakeholders, and relationships among them, in the Lead and Arsenic Residential Soil Clean-up and Community Health Program at the Vasquez Boulevard-I70 Superfund Site (Program).

For the purpose of this study a 'stakeholder' is any organization, organizational unit, program, or individual concerned with, affected by, or involved in the Program.

The EPA Site Program Manager, the client, wanted to improve his understanding in the hope that he could take additional actions that would result in as many community members as possible taking advantage of the services the Program offers.

A secondary purpose of the EPA Site Program Manager was for the assessment to provide an example of an analytical approach to involving stakeholders that could be used synergistically with the standard, largely descriptive, EPA Community Relations approach. He hoped to benefit other programs in this, and other communities, where EPA and others undertake efforts intended to improve environmental quality.

Ultimately, and more specifically and simply, the focus of the assessment became to:

- Identify additional influential stakeholders in the Program who might help increase Site residents' participation in implementation; and
- Develop strategies for avoiding or minimizing potential conflict among community groups and individuals in the Program implementation remaining.

A final note, this assessment is a collaborative work developed by the analyst as observer, then participant, the EPA Site Project Manager, and the other stakeholders who invested their valuable time and participated in the effort by providing their perspectives, concerns, and insights.

Methods

The methods this assessment uses include:

- 'Action' or 'critical' research paradigm;
- A qualitative case study research design;
- Conceptual framework;
- Sampling design to select stakeholders who were considered influential and as 'knowledgeable informants' to participate in the study;
- Data development;
- Analyst as observer and participant;

- Analysis; and
- Write-up of results and recommendations.

Readers of this report should consider the results more as 'working hypotheses' rather than certain, conclusive findings. They should consider and question the plausibility of the conclusions. Hopefully, the results will be a stimulus to more discussion and analysis, and ultimately finding ways to improve implementation of the Program.

Findings

The report presents primarily the perceptions of the stakeholders who participated in the assessment. The analysis organized the perceptions into the following general categories:

- Potential 'barriers' to Program implementation (approximately 50);
- Positive perceptions about Program implementation (approximately 20);
- 'Actions' potentially addressing 'barriers' or otherwise improving Program implementation (approximately 54);
- Potentially influential stakeholders (44 organizations and 52 individuals identified); and
- Stakeholders perceived potentially to hold a position of leadership, centrality, and/or 'bridge' among other stakeholders in the Program (19 identified).

Each of these sets is in turn organized as it relates to:

- Context within which the Program is being implemented;
- Program as a whole;
- Soils testing, removal, and replacement components; and
- Community Health Program component.

The analyst communicated some of assessment participants' concerns and suggestions to the EPA Site Program Manager as the assessment evolved. In several cases, the EPA Site Program Manager tried to address the concerns and implement the suggestions as the assessment continued.

Analysis

The analysis developed three sets of insights centering on:

- Barriers and actions:-- many issues have been fixed;
- Stakeholders: assessment identified 15 organizational and 28 individual stakeholders to involve in addition to those the EPA Community Involvement Plan (CIP) and Community Health Program response identified, but representation in 'The Process' appears to have decreased; and
- Potential for continuing tension and conflict are present in the implementation process and likely will continue for a seven significant sets of factors.

- Tension between the legal-administrative and cultural realities of 'The Process';
- Perception held that the overarching process for representing and involving site residents in the Program as a whole is faulted;
- Opposite perspectives of CHP initiative that were held by participants
- Tension between the desire, if not need, for Program Managers to work bilaterally, as well as through 'The Process';
- Competition and differences among community organizations;
- Conflicts and negative affect present among some community groups and leaders within the Site; and
- Increasing representation and involvement in the Program and 'The Process'.

Strategic and tactical action alternatives for consideration by Program Managers

The analyst provided the findings and presented the analysis described above to the Program Managers and the staff of other agencies supporting the Program on May 26, 2005. The report presents the alternatives he recommended in general summary form. The analyst asked Program Managers to consider the strategic alternatives first, then the specific tactical alternatives. They were informed that the tactical recommendations could be supplemented and refined as appropriate once they made a decision regarding the strategic approach they preferred.

Three strategic alternatives are discussed:

- Pursue a full 'community development' (CD) strategy;
- Do not pursue CD approach, 'just do it'; and
- Tailor and focus implementation of 'tactical tools' as appropriate for Program component and Site social characteristics.

Four sets of tactical alternatives are discussed:

- Work within 'The Process'
- Improve communication, and community representation and involvement
- Continue refining information basis for your decisions
- Evaluate – ask if you are using all the tools available to you as effectively as possible

The group discussed the presentation and considered the strategic alternatives. The discussion seemed to begin focusing on the relative benefits of pursuing a 'bridging approach' as compared to relying on community leaders participating in the Program to date and the CHP Community Health Workers for contacting and involving Site residents that have not yet participated in the Program. By the time the meeting broke up, the group did not seem to achieve a consensus regarding the strategic approach that they thought would be most effective.

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INTRODUCTION

Purpose and Background

The general purpose of the assessment is to develop a better understanding of the stakeholders, and relationships among them, in the Lead and Arsenic Residential Soil Clean-up and Community Health Program at the Vasquez Boulevard-170 Superfund Site (Program).

For the purpose of this study a 'stakeholder' is any organization, organizational unit, program, or individual concerned with, affected by, or involved in the Program.

The EPA Site Program Manager, the client, wanted to improve his understanding in the hope that he could take additional actions that would result in as many community members as possible taking advantage of the services the Program offers.

The Program has been, and will continue providing free services to residents living within the Program Site boundaries through September 2006. The services include:

- Sampling the soil of residential properties for lead and arsenic to find out if the levels are high enough to affect residents' health, and particularly that of children.
- Removing and replacing soil and landscaping at all properties that have levels of arsenic and lead higher than the Program standard.
- Educating neighborhood residents about the lead and arsenic health issues, evaluating lead hazards in the home, and testing young children to see if they have been exposed to lead and arsenic.

The EPA Program Site Manager wanted, and continues to want, to make sure that the soil of every residential property within the Program Site is sampled, and that all residents with contaminated soil take advantage of the services to remove and replace this soil and landscaping.

The EPA has been working cooperatively with the Colorado Department of Public Health and Environment, City of Denver Department of Environmental Health, Northeast Denver Housing, and several neighborhood organizations in planning how to carry out the Program.

A secondary purpose of the EPA Site Program Manager was for the assessment to provide an example of an analytical approach to involving stakeholders that could be used synergistically with the standard, largely descriptive, EPA Community Relations approach. He hoped to benefit other programs in this, and other communities, where EPA and others undertake efforts intended to improve environmental quality.

From this starting point in June 2004, the assessment work focused its purpose, as the EPA Site Program Manager and other stakeholders participating in the assessment provided their perspectives and concerns. Ultimately, and more specifically and simply, the focus of the assessment became to:

- Identify additional influential stakeholders in the Program who might help increase Site residents' participation in implementation; and
- Develop strategies for avoiding or minimizing potential conflict among community groups and individuals in the Program implementation remaining.

A final note, this assessment is a collaborative work developed by the analyst as observer, then participant, the EPA Site Project Manager, and the other stakeholders who invested their valuable time and participated in the effort by providing their perspectives, concerns, and insights.

METHODS

Introduction

The methods this assessment uses include:

- 'Action' or 'critical' research paradigm;
- A qualitative case study research design;
- Conceptual framework;
- Sampling design to select stakeholders who were considered influential and as 'knowledgeable informants' to participate in the study;
- Data development;
- Analyst as observer and participant;
- Analysis; and
- Write-up of results and recommendations.

Action Research

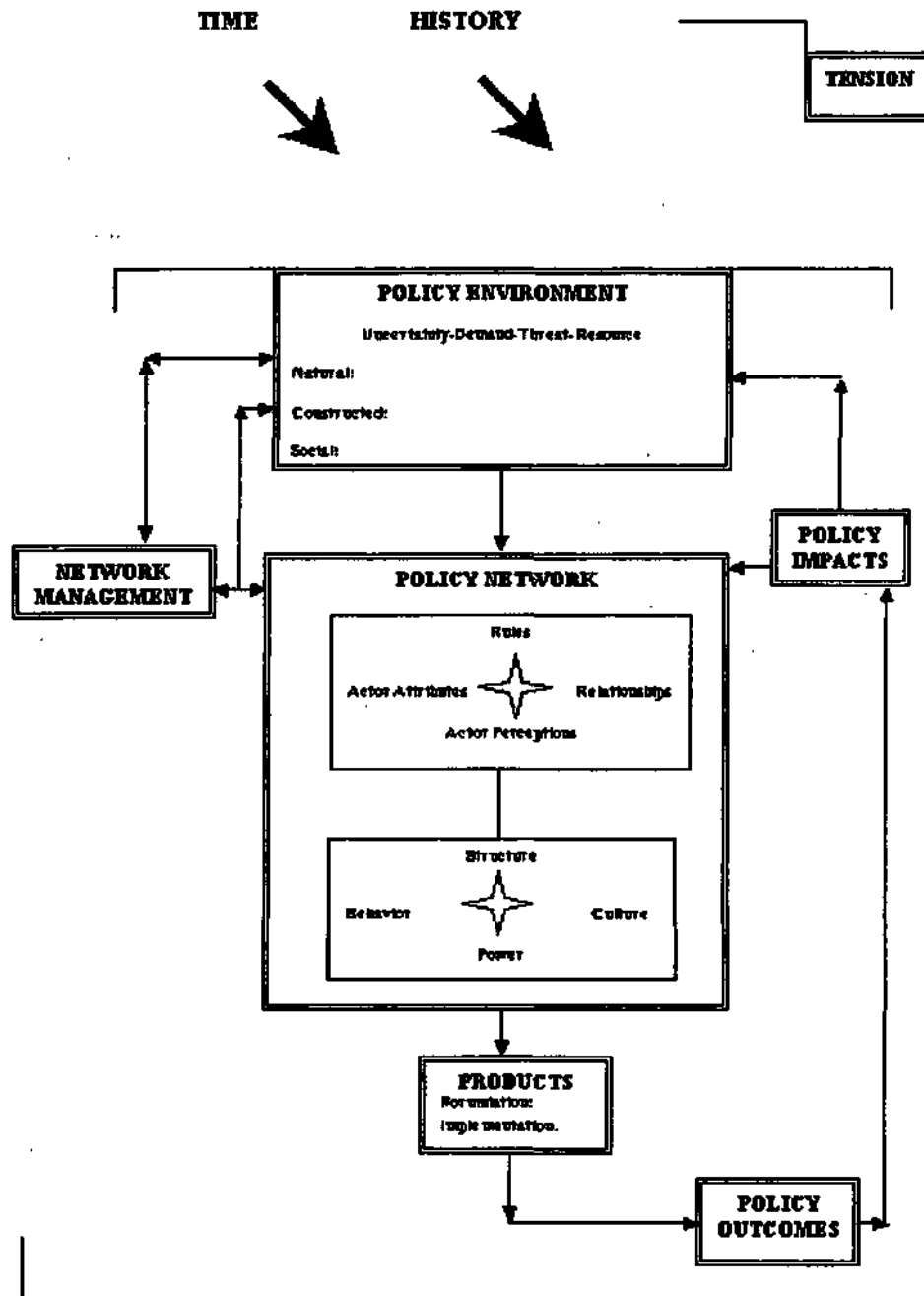
The assessment is 'action' or 'critical' research. 'Action' research is intended to intervene in a social system and motivate and/or facilitate positive change. The research process itself starts the process of change. For example, just the process of asking the survey and interview questions of participants may start the process of change as it may motivate them to think about issues about which they may not have thought or made consciously explicit.

In several instances, when participating stakeholders identified their concerns and questions related to how the Program was being implemented, the analyst communicated these with suggestions to the EPA Site Program Manager, who then tried to respond while the assessment process continued.

Conceptual Framework

A conceptual framework (Figure 1) addressing why and how stakeholders come together, or mobilize, to address a complex contemporary public policy problem collaboratively –

Figure 1
Schematic Representing Model of
Why and How and Stakeholders Mobilize to Address a Shared Problem



or not -- provides the basis for the survey and interview questions and the initial analytical categories and relationships among them. The framework is based on a broad interdisciplinary literature addressing networks and network management that draws from social, political, and policy sciences. The analyst began developing this framework in the mid-1980s and has continued to refine the approach during several applications to a variety of community development and environmental quality projects since that time.

Data Development: How Were Stakeholders Views Obtained?

The analyst developed the data on which the assessment is based using:

- Questionnaire Survey;
- In-depth follow-up interview;
- Follow-up conversations;
- Observation of October Working Group Meeting; and
- Document review; and
- Observation and participation.

The survey and interview questions were intended to seek data relevant to the components of the conceptual framework characterizing factors associated with why and how stakeholders mobilize to work collaboratively to address public issues. The analyst refined the questions he has used in previous work after administering and discussing these with the EPA Site Program Manager in order to address his purpose, which he refined this during his participation in this process.

The questionnaire survey consisted of an introductory statement describing the purpose and future use of the study, instructions, and a mix of open ended and 'yes-no' questions. The purpose of the questionnaire survey was to get respondents to identify their perceptions concerning:

- Problems that carrying out the Program would cause for them personally, and/or their organization or community, and if so, what these are and what actions they thought that EPA and/or its partners should take to address each.
- If they had any other suggestions about things EPA and/or its partners could do to carry out the VB-I70 Program more effectively.
- Specific individuals, programs, or organizations whose support and cooperation could help the EPA and its partners make contact with community members and carry out the VB-I70 Program successfully, and how they perceived that each could affect the success of the VB-I70 Program.

The analyst emailed or faxed the questionnaire survey to each of the twenty (20) individuals the EPA Site Program Manager selected originally. The analyst made multiple attempts, including telephone calls, to contact and obtain a response from each individual.

The follow-up, in-depth, open-ended interview was intended to obtain clarifications and elaborations on responses to the questionnaire survey, and further develop the analyst's understanding of each respondent's concerns and views about a number of factors that may influence the potential success of the Program implementation remaining. Examples of these factors include:

- Stakeholder's personal and organizational mission, approach, expertise, and motivation for being involved in the Program.
- Perceptions of and relationship with stakeholders they identified in their questionnaire survey response.
- Things that are helping or hurting Program implementation, or potentially could do so in the future.
- Commitment to implementing the Program successfully and how the stakeholder and his/her organization could help the effort.

Analyst Was Observer and Participant

Approximately six months after the assessment began, the analyst began developing additional data supporting the assessment as he became a participant in the Program when the EPA Site Program Manager retained him to plan and facilitate the just restarted Program Working Group meetings. The analyst thinks that there has been a synergy in serving in the two, contractually distinct roles. For example, the conversations required with stakeholders to develop Working Group agendas and work out issues prior to meetings, and conversations with other stakeholders that had not participated in the assessment, provided additional data and insights to the assessment. Conversely, the process of doing the assessment provided insights that seemed to help the analyst in being a more proactive facilitator.

Sample: How Representative Stakeholders Were Selected to Participate As Knowledgeable Informants

The sampling procedure used the 'knowledgeable informant' approach, one standard qualitative research sampling method. In this procedure, representatives of different stakeholder types and organizations, judged knowledgeable of the concerns and views of the group they are selected to represent, are selected to be invited to participate in the study and provide their perceptions.

Initially, the analyst proposed that the EPA Site Program Manager would select representative knowledgeable stakeholders to serve as the sample, with some guidance from the analyst based on previous experience developing this type of sample.

During the project 'kick-off' meeting, participants in this meeting modified the approach to identifying stakeholders to participate. These participants, the EPA Site Program Manager, Colorado Department of Public Health and Environment (CDPHE) Site Program Manager, EPA Community Relations Program staff involved in the Site, and analyst, spent considerable time discussing the type of representation from the community that would be desirable but difficult to achieve.

The group decided on a three tiered approach for developing the sample. In this approach, the analyst would administer the data collection instruments to the EPA Site Program Manager first, and then to key staff he would identify to represent the EPA Community Relations, Environmental Justice, CDPHE Hazardous Materials and Waste Management Division, and City of Denver Environmental Health programs. Next, the analyst would compile a list of the stakeholders the above participants identified and ask the EPA Site Program Manager and representatives of partnering agencies to develop a consensus rating the priority of the identified stakeholders for their participation in the study.

Subsequently, the EPA Community Relations representative decided not to participate in the assessment, and raised concerns that the data collection methods might not meet federal Paperwork Reduction Act (PRA) requirements. The analyst counseled the EPA Site Program Manager regarding how to obtain the required data AND comply with the PRA. Ultimately, the EPA Site Program Manager selected 20 individuals to invite to participate in the assessment.

Table 1 identifies the twenty (20) stakeholders invited to participate in the study, and of these, who participated fully and who did not.

<p align="center">Table 1 Sample 'Knowledgeable Informants' Invited to Participate in the Assessment and Degree to Which each Participated</p>
<p><u>Participated Fully - Completed Survey and Interview</u></p> <ul style="list-style-type: none"> • Lorraine Granado, Director, CEASE • Anthony Thomas, Vice President, Civic Association of Clayton, • Wendy Hawthorne, Manager, Healthy Homes Program, Northeast Denver Housing Center • Jim Weaver, CEASE • Joan Hooker, CEASE, Clayton Neighborhood Association • Gloria Shearer, CEASE • Victor Ketellapper, EPA VB-170 Site Program Manager • Barbara O'Grady, Project Manager, Hazardous Materials and Waste Management Division, Colorado Department of Public Health and Environment • Karen Kellen, EPA Environmental Justice Program (formerly, now Legal Enforcement Program) • Gene Hook, Environmental Health Scientist and Beverly Tafoya-Dominguez, Environmental Health Educator, Environmental Health Department, City of Denver

Table 1
Sample 'Knowledgeable Informants' Invited to Participate In the Assessment and Degree to Which each Participated

Delegated Response to Others in Their Organization Who Participated Fully

- Celia VanDerLoop, Project Manager, Environmental Health Department, City of Denver

Declined to Participate in the Process

- Jennifer Chergo, Community Involvement Coordinator, Community Relations Program, Region VIII EPA

Did Not Pursue – Did Questionnaire Survey, but Declined to Do Interview

- Harry Ford, Executive Director, Groundwork Denver

Did Not Pursue – Provided Partially Responded to Questionnaire Survey Only

- Sandy Douglas, President, Cole Neighborhood Association

Did Not Pursue – Said He Would Participate, Then Did Not Return Questionnaire Survey

- Fernando Pinata, Consultant, Groundwork Denver

Did Not Pursue – Did Not Respond to Multiple Contacts

- Beverly Lumumba, President, Clayton Neighborhood Association

Did Not Pursue – Did Not Contact In Response to EPA Community Relations PRA Concerns

- Jane Mitchell, Environmental Health Scientist, Hazardous Materials and Waste Management Division, Colorado Department of Public Health and Environment
- Michelle Macias, Hazardous Materials and Waste Management Division, Colorado Department of Public Health and Environment
- Chris Poulet, Regional Representative, Agency for Toxic Substances and Disease Registry
- Pat Courtney, Community Involvement Coordinator, Community Relations Program, Region VIII EPA
- Toni Rielly, Globeville Community Resource Center, Globeville Neighborhood Association

Analysis

The analysis derives from the standard set of activities of interpretive research:

- Organizing the data (i.e., text of study participants' responses) into categories and themes that the conceptual framework broadly defines (i.e., coding);
- Generating new categories, themes, and patterns, particularly within the initial categories derived from the conceptual framework;

- Testing insights that appear to the analyst; and
- Searching for alternative explanations.

Of note, the analyst used QSR NVivo software in developing the analysis and writing the final report. The software is designed to support the conduct and management of qualitative research and analysis. The software enables the research, and particularly the analysis and write-up, to be developed more in-depth and efficiently than doing it manually.

The analyst tabulated the issues study participants identified by:

- Reviewing questionnaire survey responses and notes of the in-depth interview within the categories and subcategories;
- Developing a 'content analysis' of each by highlighting key concepts, descriptive words, and notable quotes; and
- Writing and editing results from the above.

In the write-up, the analyst tried to be as inclusive of study participants' responses and ideas as possible. In a sense, this was like a facilitator trying to capture all the ideas put forth by participants on the blackboard during a meeting (i.e., a 'nominal group process'). The analyst attempted to be 'additive', adding to the notion of what comprises an issue as he identified additional notions in other responses.

The write-up does not reflect a weighting for the number of study participants identifying an issue. The analyst tried to be aware of potential disagreement or conflict in the perceptions of different respondents.

Additional analysis can be made with the data and software

The analyst could develop several additional and more in-depth analyses using the data developed to date and the NVivo software, if the EPA or partners wanted these developed. One example would be to increase and broaden the sample of stakeholders invited to participate in the assessment. Another example would be to identify the specific study respondents that identified specific issues or actions, e.g., in order to invite them to participate in issue specific projects or presentations.

How Project Sponsors and Others Should View Findings and Recommendations

Readers of this report should consider the results more as 'working hypotheses' rather than certain, conclusive findings.

In an ideal situation, where time and money are not limited, the qualitative research process would progress through more iterations and develop additional comprehensiveness and depth. Certainly the sample of stakeholders invited to participate would be broadened to include additional groups, neighborhoods, and organizations. The study probably did not identify every issue, stakeholder, conflict or collaboration, or for those that are identified and described, the depth possible. Nor does the assessment suggest the proportion of all stakeholders that might hold a perception or how strongly they hold this view.

However, readers should consider results of this study to date as a good start in this process. They should consider and question the plausibility of the conclusions. Hopefully, the results will be a stimulus to more discussion and analysis, and ultimately finding ways to improve implementation of the Program.

FINDINGS

Introduction

This section of the report presents primarily the perceptions of the stakeholders who participated in the assessment. The analysis organized the perceptions into the following general categories:

- Potential 'barriers' to Program implementation;
- Positive perceptions about Program implementation;
- 'Actions' potentially addressing 'barriers' or otherwise improving Program implementation;
- Potentially influential stakeholders; and
- Stakeholders perceived potentially to hold a position of leadership, centrality, and/or 'bridge' among other stakeholders in the Program.

Perceptions, not verified 'facts'

The following results are primarily the perceptions held by participants'. (In a few instances, they are observations of the analyst.) That these perceptions are held by a stakeholder is what is important. They should not be considered as 'right' or 'wrong'. The assessment did not attempt to resolve the veracity of perceptions of events.

Also, a factor may be perceived as potentially constraining AND helping Program implementation by different participants or even the same participant.

Language describing the perceptions of 'barriers', positive Program characteristics, and 'actions' is a mix of paraphrasing and summary comments by the analyst of participants' statements. In a few instances, actual quotes are captured. An attempt was made to distinguish the analyst's observations from perceptions held by participating stakeholders.

We hear you ...

The analyst communicated some of assessment participants' concerns and suggestions to the EPA Site Program Manager as the assessment evolved. In several cases, the EPA Site Program Manager tried to address the concerns and implement the suggestions as the assessment continued. In addition, when he reinstituted Working Group meetings and appointed the analyst to serve as planner and facilitator of these meetings, this enabled an additional vehicle for addressing some issues while the assessment process progressed.

Potential 'Barriers' to Program Implementation

The questionnaire survey asked participants if they 'see any problems that carrying out the VB-170 Program may cause for them, or their organization or community'. Implicit in this framing is the notion of that Program implementation could represent a potential threat to the respondent and/or his/her larger group. Additionally, the analyst noted any problems participants mentioned during their follow-up interview.

'Problems', within the context of this assessment and given the goals of the client, thus may be viewed as barriers or constraints on Program implementation. Presumably, if the barriers are removed or mitigated, then implementation might proceed more effectively and efficiently.

Many of the barriers relate to one another, and different ways of organizing these are possible. Thus, to some degree, there may be some redundancy in the presentation.

The description of barriers is organized as they relate to:

- Context within which the Program is being implemented;
- Program as a whole;
- Soils testing, removal, and replacement components; and
- Community Health Program component.

The barriers are listed below. Appendix A provides an overview description and some observations about these.

Barriers Relating to Context

- Community is composed of multiple racial and ethnic groups.
- Large population is moving in and out of the community.
- Lack of 'togetherness' and communication in the community.
- World views' of different groups may differ.
- Community members, scientists, and program staff may have different perceptions about risk.
- Some community groups and individuals focus on other issues

- Some community members may distrust government.
- Lack of involvement by local elected officials.
- Conflict exists among some neighborhood organizations and individual activists.
- General level of educational attainment of Site residents.

Barriers Relating to Whole Program

- Communication among stakeholders involved with the program.
 - Shift of bulk of current Program activities from EPA to Denver Environmental Health
 - Drop off in communication with EPA, Lack of Working Group Meetings
 - Program Steering Committee Isn't Aware of What the Working Group Is Doing
 - Problems in getting community involvement
 - ❖ Getting the right actors involved
 - ❖ Meetings have been conducted, many were not well attended
 - ❖ Little interest in community activities
 - ❖ Conflict among community stakeholders
 - ❖ Need for additional involvement in specific neighborhoods and groups
 - ❖ Considerable effort is required by site residents to stay involved
- Credibility of the Program
 - Residents sometimes feel they need to 'dog' EPA on matters – lack of follow-through can hurt EPA's credibility (See Table 2 below for their specific questions)
 - Blacks are skeptical
 - Skepticism exacerbated by characteristics of Program staff
 - Community residents don't understand why it took so long to hire the CHP staff
 - Duplication of effort -- agencies duplicating what citizens and neighborhood organizations have done
 - Information and methods that are not perceived as realistic or plausible can hurt Program credibility
 - Differences in perceptions among community residents, scientists, and maybe Program Administrators
 - Inaccurate and inconsistent information distributed in the past
 - Perceptions and/or representation of who is a member of a community

organization by others may differ

- Program design
 - Scope of work
 - Planned end date
 - End of funding from EPA
- Administration
 - Coordination
 - ❖ Potential for 'triangulation'
 - ❖ Some confusion seems to have occurred with the recent initiation of the CHP and role of Denver Environmental Health
 - ❖ Need to coordinate the two programs testing blood
 - ❖ Need to coordinate lead based paint abatement programs of others with EPA soils clean-up
 - ❖ Need to coordinate at outreach events
 - Not enough site residents and businesses have been hired to conduct Program work
 - Slow pace of bureaucratic process

Barriers Relating to Soil Sampling, Removal, and Landscaping

- Soil sampling and replacement does not seem to motivate the interest of community as much as setting clean-up threshold did
- Soil removal, replacement, and landscaping has some problems
 - Concrete etc damaged from clean-up
 - Home foundations damaged from clean-up
 - Rocks falling on sidewalks
 - Fences damaged from clean up, some not replaced properly
 - Sprinklers were not put back correctly, some owners had to pay the cost
 - Landscaping
 - ❖ Lack of xeriscaping or drought resistant landscaping, lack of outreach and education about xeriscape
 - ❖ Many replaced lawns died
 - ❖ Elderly and disabled can't make it to the landscaping store
 - ❖ Not enough thought was put into the landscaping, the neighborhood doesn't look professional, and some residents have incurred significant costs
 - Water bills went up and watering permits were taken

Community Health Program

- Lack of community involvement in Community Health Program (CHP) development
- Disappointed in performance of some staff
- CHP start was delayed, now the duration planned is significantly shortened
- 'Slow pace of implementation', need to keep pressure on DEH
- Need to coordinate two programs testing blood

Table 2
Questions for EPA from Assessment Participants --
Potential Barriers Related to Whole Program

1. When is the Program end date? When will the program end? Will it be 9/06, making for only a two year CHP? Why has EPA deviated from its commitment of a minimum of three years for the CHP, and prior discussion of a program lasting up to ten years?
2. What are the characteristics of the replacement soil? What are the characteristics of the soil used to replace the contaminated soil removed? Apparently EPA answered this question for the person who asked, but perhaps others have the same question.
3. Is the process set-up to enable the community to work with Northeast Denver Housing Center to replace exterior lead based?
4. Has a process been set up so that residents that are unable to shop for, pick-up, and transport landscaping materials (e.g., elderly, disabled) can call a contractor to do this?
5. Xeriscape?
6. Has EPA talked with the contractor to ensure that rock used rather than soil is not ending up on sidewalks?
7. Has EPA provided authority to residents to tell the contractor that the replacement is good or bad?
8. What is EPA going to do about lead based paint?
9. Will EPA do anything to assist residents with large (e.g., \$69, \$270 per month) water bills?
10. Has EPA determined if the soils removal and replacement process, damaged foundations, "crock pipes", and/or otherwise responsible for basements flooding, in some cases?
11. What is EPA spending on the average home to remove and replace soil and landscaping?
12. Does EPA have scholarships and jobs, especially for minorities?
13. Did EPA take the Conoco money?
14. What is the status of contacting and involving real estate agencies? The Working Group had planned on contacting realtors, paint places, etc. to check on lead in houses, and if it has been removed properly. We have no idea if anything has happened with this.
15. What is the status of EPA's intent to inform health providers serving this community about the potential that residents, children in particular, have been contaminated with lead and arsenic and that they should encourage their clients to have their children screened?
16. What is the status of addressing interior lead based paint?
17. What efforts have been made, and are materials developed and distributed, to explain why some residential properties are addressed and others not, given that the pattern of contamination and clean-up is not commonsensical? (Why is my neighbor getting cleaned and a new lawn and I'm not?)
18. When EPA has a yard tested, why are they not providing residents with the results? Can EPA do this?

'Good things potentially supporting Program implementation

Stakeholders participating in the assessment volunteered many things that they perceived as positive about the Program, although the survey and interview did not ask this question explicitly.

These positive factors are important for Program Managers to consider, as these are aspects of implementation that would seem to be working effectively. These 'good things' about the Program arguably may be easing, facilitating, or motivating implementation to be successful. They may be viewed as 'potential resources to Program implementation'.

The description of 'good things' is organized as they relate to:

- Context within which the Program is being implemented;
- Program as a whole;
- Soils testing, removal, and replacement; and
- Community Health Program.

The good things are listed below. Appendix B provides an overview description and some observations about these.

Good things relating to context

- Site has many existing neighborhood organizations that are potential resources to Program implementation
- Substantive service organizations serving site neighborhoods
 - Northeast Denver Housing Center
 - HAND (Healthy Air of Northeast Denver)
 - Focus Points Family Center in Five Points
 - East Side Health Care Center
- Regular neighborhood events
- Leadership Seminars
- Neighborhood churches
- Neighborhood schools

Good things relating to whole program

- Overall good program, good people
- Character of stakeholder/community involvement
- EPA Site Program Manager
- EPA funding
- Getting Spanish speakers involved, and the Promotoria
- Reinstating Working Group meetings
- Citizens participating in clean-up program
- Lists – related stakeholders

Good things relating to soils testing, replacement, and landscaping

- Outstanding
- A wonderful blessing health-wise
- New soil put down, out door smell fresh and wonderful
- New soil was beautiful
- My new lawn looked beautiful

Good things relating to Community Health Program

- Outreach Plan

Action recommendations suggested for consideration

Introduction

The analyst derived 'actions suggested for consideration' from two categories, i.e., participants in the assessment suggestions for:

- Eliminating or mitigating a barrier; and
- Improving implementation generally, and unrelated to a specific problem which they may have identified.

The EPA Site Program Manager, with support from the analyst, has implemented some of these during the assessment process. Some others have been implemented as a result of progress in Program implementation that occurred during the time the assessment progressed to completion.

The description of 'actions' is organized as they relate to:

- Context within which the Program is being implemented;

- Program as a whole;
- Soils testing, removal, and replacement; and
- Community Health Program.

The 'actions' are listed below.

Actions addressing whole program

- Improve communications by restarting and continuing monthly Working Group meetings
- Improve community representation and involvement
 - Build networks of the key people with whom EPA can build working relationships that will help support this clean-up
 - Work to maintain the commitment and cooperative involvement of Involvement of the community organizations and leaders that have been involved
 - Identify and obtain the commitment and cooperative involvement of additional community organizations and leaders in implementing all Program components
 - Work to build trust
 - Involve every race and nationality
 - Customize program implementation to different neighborhoods and ethnic groups
 - Do more outreach and education in Five Points
 - Use the Promotoria model for Hispanic households
 - Investigate if there is an analogy to the Promotoria model that could be used and improve the effectiveness of Program implementation with other groups
 - 'Tap into what is going on' – Conduct outreach, education, and services at the regular events of community organizations, e.g., including neighborhood clinics, schools, churches, Northeast Denver Housing Center, Head Start, child care centers, and Fall Festival
 - Train neighborhood groups consistently -- then contract with them to carry out Program activities in their neighborhoods
 - Respect community organizations in defining their membership and how they operate
- Increase influence by improving Program credibility
 - When you commit to something, follow-up and report back
 - ❖ Keep people informed about what you're doing
 - ❖ Follow-up on residents' suggestions and report back to the group

- when you agree to do something – Program managers should address questions from participating residents (Table 2)
 - ❖ Develop, produce, and distribute quarterly a bilingual newsletter reporting progress to site residents
- Develop information and methods that are realistic, plausible, accurate, and effective for all residents
 - ❖ Educate residents regarding how the apparent erratic spatial pattern of contamination occurred
 - ❖ Ensure that information distributed is accurate and consistent
 - ❖ Develop materials that explain things simply and concisely, in simple language
 - ❖ Develop materials in at least English and Spanish, and perhaps other languages
 - ❖ Develop means for transmitting information verbally in the multiple languages spoken by site residents – identify individuals who can provide information to non-English speaking residents, in addition to Spanish speakers
- Decrease risks to health by addressing limits in Program authority, design, and funding
 - Educate stakeholders regarding the scope of work Superfund permits and its limits – manage expectations
 - Addressing ‘Scope of Work’
 - Bring current Program stakeholders together, and others, to try to develop creative alternatives, including funding, for addressing risks to health from lead that Superfund is not authorized to address (e.g., lead paint)
 - Provide more funding to the neighborhoods for beautification
- Improve effectiveness and efficiency of Program administration
 - Improve coordination
 - ❖ Stay true to Working Group process – develop agreements for conducting and funding Program related activities within the Working Group and not bilaterally
 - ❖ Ensure coordination with other organizations doing similar work, e.g., Groundwork Denver, blood testing programs
 - Hire more individuals, non-profit organizations, and businesses from the neighborhoods encompassed within the Program Site to do Program work, and particularly minorities
 - Hire more blacks and Hispanics in high EPA positions

Actions addressing soil removal, replacement, and landscaping

- Fix or replace things broken by soil removal and replacement, e.g., including fences, sidewalks, patios, and foundations
- Make the replacement landscaping look more professional
- Provide for and implement xeriscape and other low water landscaping
 - Provide for and publicize xeriscape and low water landscaping as alternatives to sod
 - Train residents and contractors in xeriscape and low water landscaping
 - Enable residents to do the landscaping
- Help seniors and disabled pick-up and transport landscaping materials to their homes, then do planting and installation
- Provide residents more funding for replacing the original landscaping before it was removed
- Provide funding only for landscaping, enabling residents to control replacement
- Provide more guidance to contractors regarding use of stone
 - Ensure that the contractors do not get replacement rock on sidewalks
 - Authorize residents to evaluate and approve the work of the contractors
- Provide better soil with more organic matter where residents want sod
- Provide additional follow-up by EPA or contractor to encourage watering sufficient for establishing sod where residents choose this alternative
- Provide funding assistance for increased water bills to households replacing landscaping and establishing sod
- Inform the public about the amount of money spent per home for soil removal, replacement, and landscaping

Actions Addressing Community Health Program (CHP)

- Actions addressing lack of community involvement in Community Health Program (CHP)
 - Enable citizens to have a bigger impact on developing the CHP
 - Involve community groups in implementing the CHP
 - ❖ Work through existing neighborhood groups to implement the CHP, and specifically CEASE
 - ❖ Obtain the cooperation and participation of agencies and community groups and coordinate their involvement to implement the CHP effectively
 - ❖ Ensure that all stakeholders are invited, get involved, and feel their participation is important and appreciated

- ❖ Ask the members of each of these groups to identify their questions and concerns, recruit volunteers when needed, and share information within their own community
- ❖ Increase efforts to involve residents and community groups in the Five Points neighborhood
- ❖ Train neighborhood groups in all aspects of the soil sampling, removal, and landscaping Program components so they can either answer the questions of site residents or refer them to resources that can
- Use the CHP to develop the capacities of the Program Site communities to continue community health functions into the future after EPA Superfund support ends
- Develop, produce, and distribute a CHP newsletter
 - ❖ Format as two pages, one side each in English and Spanish
 - ❖ Distribute once per quarter

Stakeholders identified

The survey asked participants if they perceived any individuals, programs, or organizations whose support and cooperation could help the EPA and its partners make contact with community members and carry out the Program successfully. Then, the in-depth interview asked them several questions about each potentially influential stakeholder they had identified, including:

- Why they thought the stakeholder was influential;
- What they thought the interests of each are with regard to the Program; and
- If they had dealt with them before and how.

The analyst asked the questions attempting to understand how stakeholders perceived one another and the relationships among them.

Assessment participants identified a total of forty-four (44) organizational and fifty-two (52) individual stakeholders.

The analyst developed a 'contingency table' of these stakeholders (i.e., spreadsheet), matching the identified individuals with the organization or group with which assessment participants identified as affiliated, and conversely matching identified organizations with individual representatives that participants identified.

The analyst has provided the full spreadsheet of stakeholders to the EPA Site Program Manager for his use. (The spreadsheet is too large to reproduce easily and legibly in the paper final report document.)

Of these, Table 3 presents the stakeholders that participants or the analyst identified as of potentially of particular interest to Program managers. The reason they may be of special

interest is because they were noted as currently or potentially in leadership, 'central', and/or 'boundary spanning' (i.e., bridging) positions among stakeholders in the Program. (Please note that the assessment did not result in complete information for all of these individuals, including organizational affiliation and even last names in a couple of cases. Complete information can be developed from assessment notes and follow-up contact with the appropriate participant, if Program Managers are interested in having this developed.)

Table 3
Stakeholders Identified by Participants and/or Analyst as Potentially Holding
Leadership, Central, and/or Boundary-Spanning Positions Among
Program Stakeholders

- Lorraine Granado
- Dr. David Millard
- Dr. Michael Kosnett
- Sandy Douglas
- Wendy Hawthorne
- Anthony Thomas
- Beverly Tafoya-Dominguez
- Beverly Lumumba
- Brother Jeff
- Terry Lohman
- Blanca
- Theresa
- Annie Casey
- Debra Johnson
- Patty Lawless
- Jeromy Simons
- James Chapman
- Adam and Stephanie Sanders
- Jim Weaver

ANALYSIS

Introduction

The analysis developed three sets of insights centering on:

- Barriers and actions:-- many issues have been fixed;
- Stakeholders: assessment and CHP have identified stakeholders to involve in addition to those the EPA Community Involvement Plan (CIP) identified, but representation in 'The Process' appears to have decreased; and
- Potential for continuing tension and conflict are present in the implementation process and likely will continue for a variety of reasons.

The following discussion explores each of these sets of insights the analysis produced.

Barriers and Actions: Many issues have been fixed

As noted previously by this report, the assessment is 'action' or 'critical' research intended and designed to interject or intervene in a system and facilitate positive change. By doing the research, i.e., asking questions, the research started the process of getting participants to think about these issues, bring them into consciousness, and in many cases, get them on the table to be addressed.

The EPA Site Program Manager has tried to address several of the concerns and issues raised, particularly by Site residents. A significant example is the starting of Working Group meetings again -- addressing a major concern of Site residents and providing a forum within which their other concerns and questions could be raised and hopefully addressed. In addition, Site residents identified several issues, concerns, and questions related to EPA follow through and specific problems with program implementation. The CHP development process is perhaps the most significant, although several other specific issues were raised. The EPA Site Program Manager, working with the analyst in his other role as planner and facilitator for Working Group meetings, has been able to address many of these through presentations in meetings, or telephone calls to the individuals expressing a particular concern.

Stakeholders: Assessment and CHP have identified additional stakeholders to involve, but representation in 'The Process' appears to have decreased

Additional influential stakeholders with potential for improving Program implementation have been identified

The analyst developed a spreadsheet (i.e., 'contingency table') of the stakeholders identified, matching the individuals with the organization that assessment participants identified them as affiliated, and conversely matching identified organizations with individual representatives that participants identified.

The analyst has provided the full spreadsheet of stakeholders to the EPA Site Program Manager for his use. (The spreadsheet is too large to reproduce easily and legibly in the final report document.)

Examination of this spreadsheet reveals that:

- Every affiliation of the individual stakeholders identified was not identified.
- Stakeholder organizations were identified, but in some cases individual representatives to contact were not.
- Some stakeholder types were identified, but no specific organizations or individual representatives within this type identified. However, in many of these instances, the EPA CIP identifies these, e.g., public schools, churches.

In this same spreadsheet, the analyst also noted if the EPA CIP had identified each stakeholder previously and also if the CHP representatives had identified each in their survey and interview responses.

This analysis suggests that:

- EPA, in initiating the Community Health Program (CHP), was able to expand on the stakeholders identified using its standard community relations approach in developing its CIP; and
- This assessment probably did identify some additional stakeholders that neither the CIP nor the CHP have identified to date.

Of the total stakeholders identified, the survey and interview responses of the CHP representatives identified twelve (12) organizational and fifteen (15) individual stakeholders that the EPA CIP did not identify.

This finding suggests that the EPA decision to initiate the CHP was potentially effective from the value perspective of establishing a basis for potentially increasing the number and type of stakeholders that Program Managers may involve in the Program.

In addition, this assessment identified fifteen (15) organizational and twenty-eight (28) individual stakeholders that neither the EPA CIP nor the survey and interview responses of the CHP representatives identified.

No criticism is intended of the EPA CIP. The version used for the comparison is dated, i.e., September 1999, and EPA released a revision as the analyst was finalizing the assessment final report. Additionally, the purposes of the CIP, CHP assessment response, and assessment are different.

Certainly, the exercise of identifying stakeholders the assessment and CHP identified that the EPA CIP did not over states the number of new stakeholders identified by the CHP and this assessment. Some of the stakeholders identified by the assessment may have become known to the EPA since it produced the earlier CIP, and in fact some were identified by the EPA Site Program Manager (who was not involved in the Program at the time EPA produced the earlier CIP, nor listed by it) for inclusion in the sample. In addition, the CHP certainly has identified many stakeholders for its own purposes since its representatives provided their assessment responses.

Important for the purpose of this assessment, is that the EPA and CHP review the list of stakeholders this assessment identified to identify those that they have not known about, then contact and begin to involve them in the Program.

Table 4 presents stakeholders identified by this assessment but not by the EPA CIP or CHP representatives' assessment response. (The analyst did delete some stakeholders that he knows are known to EPA.) Table 3 above identifies stakeholders judged to be in leadership, central, and/or boundary-spanning (i.e., bridging) positions among stakeholders in the Program.

Table 4
Stakeholders Identified by the Assessment but NOT by the EPA CIP or CHP Assessment Response

INDIVIDUAL	Clayton	Cole	Five Points	NA	CEASE	Healthy Children's Partnership	Cole Neighborhood Association	Community Justice Program (Cole Neigh Assn?)	Low Income Housing Program (Cole Neigh Assn?)	Groundwork Denver	Focus Points Family Center	Hope Center	Family Star	Sandy Douglas's Leadership Training	Denver Urban Gardens	Denver Digs Trees	Denver Foundation	Denver Botanical Gardens	Metropolitan Organization of People	Our Lady of Grace Church	Annunciation Church	King Memorial Church	St. Martin	neighborhood associations in all five neighborhoods	U.S. Department of Housing and Urban Development	Child Care Centers	Colorado Department of Public Health and Environment	City of Denver Environmental Health	City of Denver Public Health East Side Health Care Co
Gloria Schear		x			x		x															x							
Charolette Reese		x																				x							
Andy Casey		x					x																						
Dr. Michael Koemett			x		x																								
Steve Reams		x																				x							
Brother Jeff			x																										
Akwan																													
Terry Lohman			x							x																			
Father Monahan																				x									
Geri Lawson											x																		
Sara Stokes												x																	
Patty Lawless			x																		x								
Thema		x				x	x												x										
Annie Casey		x				x	x												x										
Debra Johnson		x				x	x	x						x															
Jeremy Simons		x				x	x	x																					
James Chapman		x				x	x		x																				
Stephanie Sanders		x				x	x																						
Adam Sanders		x				x	x																						
Liza Lofton	x																												
Harry Ford										x																			
Fernando Pinata																													
Mishelle Macias										x																			
Derrek Boer																										x			
Beverly Tafoya-Dominguez																											x		
Barbara Decker																													
Liza Lofton																													
William Phillips																													

Representation may have decreased over time

The analyst has the impression that 'The Process', i.e., loosely defined as decision making about the Program and the groups and their meetings addressing Program planning and implementation, may have lost some representation and involvement of Site residents during at least the spring and summer of 2004.

This impression is based on the response to the request to participate in this assessment (i.e., those that did not respond or participate) and attendance at the reinitiated Working Group meetings, compared to representation and involvement in these meetings in prior years as revealed by the minutes of these past meetings. In particular, it seems that representation and involvement of the Black community had decreased.

The analyst hypothesizes that potential factors responsible for this include:

- Lack of Working Group meetings during at least spring and summer of 2004;
- Absence of several key individuals during this period;
- Other factors, including conflicts among some groups and individuals, resulting in some claiming to feel "pushed out" of 'The Process'; and
- Program evolving into the implementation phase, and no longer in a developmental phase.

Several key individuals were fully or partially absent from 'The Process' during the spring and summer of 2004. Each of these individuals seemed to play a key role in facilitating communications and relationships among stakeholders in the Program, e.g., they served in leadership, facilitating, central, and or boundary spanning positions in the network of Program stakeholders. The individuals are employed by the government agencies as well as are members of community groups. They were absent for a variety of reasons, but primarily health, family, or job related.

Regarding conflicts among stakeholders, the analyst learned of some of these during the assessment process, but only a limited amount about their origins and history. Most likely, more would have been learned if more of those invited to participate had done so. The analyst has learned more since being appointed facilitator of the Working Group.

It does not seem as though it would be productive for 'The Process' to discuss specifics details of these conflicts in this report. The analyst and EPA Site Program Manager have been and are continuing to work to minimize constraints that these conflicts potentially could impose on the success of Program implementation.

Regarding representation and involvement decreasing at this phase of the Program, this could be a phenomenon that would be expected based on research on the formation and development of networks of stakeholders around a policy problem or project. Simply put, at the initial stage, stakeholders will come into a network to address a general

problem or set of concerns. Relative to the later stages of development, the number and types of stakeholders will be more numerous, their differences greater, and the relationships binding the actors together will be 'looser' as they work to define the problem, and goals and means for addressing them.

In the later stages, i.e., implementation, many actors will move to the outer periphery of the network. Fewer actors will be in the center of the network, actively involved in implementation. Of these actors, their relationships will tend to be more 'tightly bound', and differences among them will be less, or perhaps more accurately, they will have 'worked out' issues, e.g., activities addressing problems, roles and resources each is contributing to the effort, benefits each is receiving, and 'rules of the game', e.g., how to resolve differences, make decisions, etc.

From this perspective, the finding that representation and involvement may have decreased could have been expected.

However, with the reinstitution of Working Group meetings, and some actions being taken to address representation and involvement explicitly, representation and involvement is increasing again, at least temporarily.

Potential for continuing tension and conflict are present and likely will continue

The potential for conflict will remain present throughout the remainder of Program implementation because of at least seven significant factors that relate to one another:

- Tension between the legal-administrative and cultural realities of 'The Process';
- Perception held that the overarching process for representing and involving site residents in the Program as a whole is faulted;
- Opposite perspectives of CHP initiative that were held by participants
- Tension between the desire, if not need, for Program Managers to work bilaterally, as well as through 'The Process';
- Competition and differences among community organizations;
- Conflicts and negative affect present among some community groups and leaders within the Site; and
- Increasing representation and involvement in the Program and 'The Process'.

Potential for conflict is present given that the legal-administrative and cultural realities of 'The Process' differ

The 'legal-administrative' reality, in contrast to the culture that has developed of what 'The Process' is, have created expectations that are a potential source of conflict. Again, 'The Process' is defined loosely as decision making about the Program and the groups and their meetings addressing Program planning and implementation.

The legal-administrative reality is that the EPA and CDPHE Superfund Program Managers have responsibility and authority for making decisions. Part of this reality is the pressure on the Program Managers to accomplish their missions effectively and efficiently. All other stakeholders – i.e., other government agencies and programs, non-governmental community organizations, site residents, etc. are in an advisory and/or supporting role.

The cultural reality that has developed seems to be what one could characterize as similar to a 'community development and/or organizational development' process. This type of culture would emphasize community control, comprehensive representation, openness, involvement, discussion, and consensus decision-making.

There is a tension, if not conflict, inherent between these two different ways of doing things and the associated expectations functioning in the same Program context. Are Program Managers, unconsciously, albeit with the best of intentions, trying to 'have it both ways'?

All participants, including community residents, acknowledged and, with a couple of exceptions, had high praise for 'The Process' and Program Managers' intensive efforts to obtain broad representation and significant community involvement in Program planning and implementation.

Yet, there have been two recent examples of the Program Managers making a decision, apparently on their own, and conflict occurred, not only with community residents, but apparently with some staff of supporting government programs. The two decisions are:

- Decision to award the CHP contract to the Department of Environmental Health, City of Denver (DEH); and
- Development of method for determining eligibility for external lead based paint abatement.

Some may hold a perception that the overarching process for representing and involving Site residents in the Program as a whole is faulted.

One community leader, who did not participate in the assessment, but who began contacting the analyst in March 2005 in his role as Working Group facilitator, made it

very clear that she perceived 'The Process' as NOT representative and as flawed." In addition, she did not perceive that the accomplishments up to and culminating on 4/7/05 as resolving the issue. To illustrate, she made the following statements:

'The Process' was not, and is not to this day, is not representative of the neighborhoods involved.

The problem is the process.

The rules of engagement are flawed.

Look at 'The Process', it is abusive verbally.

'The Process' is restrictive and exclusive.

4/7/05 doesn't fix it.

She stated that she is not at the table. When invited to attend the meetings, she stated that she won't come until a Working Group meeting is held in her neighborhood. She said it is not fair to invite her if her community is not represented. She wants to see Clayton recognized as a community. She wants a community based meeting, and feels like some community leaders have a priority to make sure this doesn't happen.

This perspective, although provided by one person who did not participate in the assessment, does raise a significant question – i.e., 'To what degree is this perception held by other Site residents?'

The analyst notes the Working Group, at its May 19 meeting, agreed to rotate its meetings through the different neighborhoods encompassed within the Site, contingent on appropriate facilities being identified and available. The analyst in his role as Working Group facilitator is working with a Clayton leader to identify a meeting site in that neighborhood.

Opposite perspectives of CHP initiative were held by participants

Opposite views of the CHP development process were held by DEH as compared to community residents.

Community representatives perceived that they were not involved in EPA's initiation of the CHP, i.e., decision to award the contract to DEH, or development of this program. Some quotes, that a community participant asked the analyst to capture, make the point:

We (CEASE) think that problems could arise because community representatives have had so little opportunity to help shape and decide where, when and how the community health plan will be (was) developed: i.e. what was included; what was excluded; what the goals and objectives are; who will implement what parts; and,

most important to us, how community representatives and other people will or will not be included in detailed planning, decision making related and evaluation of the project.

Commitments were made that we would fully participate in development of the CHP. The group stopped monthly meetings after clean-up started. Once this stopped, we felt left out.

The CHP was not established yet when monthly meetings stopped. EPA started the clean-up, then, EPA contracted out the community education to Denver Environmental Health. Denver Environmental Health had a series of meetings at the family center in Globeville. All we did was look at materials that would be appropriate to hand out. After that, we were blocked out of the process.

We were cut out of loop after meetings stopped. Totally contrary to how we worked.

We need this. So much of our work comes out of this group. We can't be the go-between with the neighborhood with out these. WE were very unhappy that meetings stopped and that contract given to DEH with no consultation with us. We were PROMISED that we would have a significant total role in developing CHP. Completely taken away, no role once contracted out. This was a breach of promise.

Everything else has gone so well. We were full partners in everything else from the very beginning. Then we were totally excluded from CHP -- totally opposite from before.

In contrast, the DEH participants described a very comprehensive and intensive effort to identify and involve Site residents in developing the CHP. The DEH representatives did not raise the issue of the process used for awarding the CHP contract to their agency.

To make the point, one DEH participant essentially said:

All community leaders, with vision, time, and commitment, are motivated and can motivate others. They have invested so much energy -- Denver wants them to be committed. Others will respect their opinion. If they don't view the Program as good, if they oppose it, others will follow their view and lead. *That's why we, Denver, spent so much time letting them design the program.*" (Analyst's emphasis)

Left unresolved, this difference would seem to be a potential source of significant conflict.

The analyst can only speculate at why or how these stakeholders have such different perspectives:

- Did DEH reach out to others, but NOT to CEASE and its members? Did CEASE and its members 'fall through the cracks'? If so, how?
- Does the issue relate more to specific DEH staff and how they worked and the relationship between them and some community members?
- Is this finding an artifact resulting from the limited type and number of stakeholders participating in this assessment? In other words, although these opposite views would still be present, would a larger and more representative sample of stakeholders participating have revealed views between these opposite poles or that a preponderance of participants hold one rather than the other view?

The questions might be answered by taking a closer look at who DEH contacted and how they tried to involve them in CHP development.

Other factors that may have contributed to this difference occurring have been noted already, for example:

- Difference between the legal-administrative and the culture that has developed of 'The Process';
- Communication problems, and most specifically lack of Working Group meetings; and
- Absence or less intensive involvement of several key agency and community individuals during the spring and summer 2004.

The analyst, and community leaders still participating in Working Group meetings, think that the potential conflict has been mitigated, if not resolved, by the efforts to negotiate actions to improve community representation and involvement that occurred between the March Steering Committee meeting, discussions up to and at 3/31/05 Working Group meeting, and decisions made at a 4/7/05 meeting between community leaders and CHP Coordinators.

The analyst called each of the community leaders participating in these meetings who had expressed the concerns about the CHP. These leaders thought that the decisions made 4/7/05 resolved the issue, or at least had the potential for resolving them -- if the decisions are implemented well, with openness and discussion.

However, the analyst cautions the Program Managers to continue to monitor community leaders' satisfaction with community representation and involvement in Steering Committee meetings.

Tension between the desire, if not need, for Program Managers to work bilaterally AND through 'The Process'

A strategy of trying to customize remaining implementation, i.e., with the Program Managers trying to work with different community groups individually and separately, AND working through 'The Process' in order to avoid existing conflicts seems to hold the potential for conflict.

The EPA Site Program Manager and DEH representatives explicitly proposed that they would attempt this type of strategy trying to avoid having existing conflicts among some community groups and leaders affect Program implementation. At the same time, the DEH and community representatives explicitly expressed the desire that participants in implementation "work through the process" as illustrated by the following response:

EPA should try to avoid triangulation. Some groups might try to approach EPA on a separate basis, e.g., 'Oh we weren't funded, we'll go to Victor.'

We need to stick to 'The Process' and not do an end-run outside of 'The Process' to try and get a function or funding.

EPA shouldn't make agreements outside of 'The Process' with the other stakeholders not knowing. These issues need to be worked through the group, i.e., the 'Working Group'.

The participant noted that his concern applied more to the CHP, rather than the remaining soils sampling and remediation components, and that it was a "hypothetical now", at the time he was interviewed in the summer of 2004.

Conflict between these two strategic approaches seems obvious to the analyst. The two strategic approaches considered together present a dilemma. They represent a potential source of conflict in two ways.

First, EPA and CDPHE have the decision making resources, e.g., authority (and responsibility) and funds, thus potentially they may be reluctant to, if not prohibited from, surrendering decision making authority to the Working Group.

Second, trying to implement a strategy of customizing implementation activities to work one-on-one with specific community groups and leaders in order to avoid becoming entangled in conflicts among them may result in conflict if all of these community stakeholders are participating actively in the Working Group.

The second is the more problematic, and seems 'lose-lose'. Based on the pattern of conflicts and negative affect of specific stakeholders for others, conflict could arise within Working Group meetings if EPA and/or CDPHE proposed executing a contract with a specific organization as an agenda item seeking consensus approval from the group. On the other hand, if EPA and/or CDPHE were to award funds to a group outside

of the Working Group process, it seems likely that this act would become a source of conflict within the Working Group process, perhaps in a more intense form given the expectation for an open and consensual decision making process.

Complicating the issue is that even among the citizens originally involved in the Working Group, clearly some appear to have abdicated from, and/or feel that they have been 'pushed out' of, 'The Process'. If Program Managers only work through 'The Process', the community groups and leaders still participating would seem to have a strong advantage of entering into bilateral arrangements, while those who are not participating would not. Conversely, if Program Managers enter into bilateral agreements with community groups and leaders who are not participating in the Working Group, then clearly they are liable for criticism for NOT working within 'The Process'.

This raises some questions for the Program Managers and other partners to consider, including:

- Should Program Managers remind Working Group participants that ultimately that the EPA and CDPHE Program Managers are the decision makers, and that the Working Group IS advisory, and that even other government programs are in advisory and supporting, not decision making, roles?
- How would 'NOT triangulating but working through The Process' affect the potential for conflict?
- Should Program Managers be explicit that the Working Group is THE main arena -- and that community groups and leaders need to be involved -- or they will not be considered to help in implementation?
- Should Program Managers continue to work aggressively to broaden community representation and involvement, and in particular, give additional effort to recruiting those who have withdrawn from the process, regardless if they abdicated or felt 'pushed out'?
- Should Program Managers just proceed and 'cut deals' bilaterally -- at the risk of stirring conflict with CEASE and the larger Working Group?

Frankly, the analyst does not see an easy solution to the dilemma. However, two decisions have been made during the spring of 2005 that, taken together, seem to comprise a selected alternative. It remains to be seen if this approach minimizes the potential conflicts described above.

The two decisions are:

- Approval by the Working Group during its 5/19/05 meeting of the general principle that the EPA will work bilaterally with specific community stakeholders to obtain their assistance in getting the soils of specific areas, groups, and

households sampled and remediated and NOT have to come back to the Working Group to discuss and approve each specific agreement.

- Agreement by the Working Group during its 3/31/05 and 4/7/05 subgroup meetings that the Program could obtain assistance from specific community stakeholders in implementation -- IF these stakeholders are appropriately trained and supervised.

Competition and differences among community organizations

Basic interorganizational theory, experience, and common sense suggest that in the contemporary policy context – organizations and leaders are in competition for domain (or ‘turf’) and resources. This can be a potential source of conflict.

Resources include, not only obvious funding, but also a variety of other resources, e.g., authority, and political influence with actors that are external (e.g., outside the network who can provide resources) and internal, i.e., community members who will respond to requests from a leader and take certain actions.

Other sources of potential conflict are potential differences in their perceptions of ‘the world’, values, and problems, and how they operate to carry out their missions

DEH may be a competitor and EPA may have enabled this

From the interorganizational perspective, DEH may be a competitor with neighborhood organizations, and EPA may have enabled this. It seems obvious that EPA’s grant to DEH to do the CHP has to some degree created and injected a new, powerful actor into the ‘VB-I70 network’, and the resources and activities of this new actor certainly are changing the relationships and relative power among the network of community organizations and residents from what it was before.

Conflicts and negative affect ARE present among some community groups and leaders within the site.

This is perceived by many of the assessment participants. The competition among community organizations and leaders potentially are at least one set of factors motivating this, although certainly there are others, for example, contextual, such as the rapidly changing demographics of the Site.

Increasing representation and involvement in the Program and ‘The Process’ may increase the potential for conflict

Research into network formation and development in policy problem areas suggests that network characteristics differ, changing with the evolution of the network through different phases of activity, e.g., formation, problem definition, planning, implementation, etc. Also, if representation is broadened and involvement increased, the potential seems present that some new participants will want to renegotiate issues that

were thought to be resolved already. These issues may be more than substantive -- but also include the 'rules' for conducting 'The Process'.

STRATEGIC AND TACTICAL ACTION ALTERNATIVES FOR CONSIDERATION BY PROGRAM MANAGERS

Introduction

The analyst provided the findings and presented the analysis described above to the Program Managers and the staff of other agencies supporting the Program on May 26, 2005. The following discussion presents the alternatives he recommended in general summary form below. The Program Managers were asked to consider the strategic alternatives first, then the specific tactical alternatives. They were informed that the tactical recommendations could be supplemented and refined as appropriate once they made a decision regarding the strategic approach they preferred.

Strategic alternatives

Pursue a full 'community development' (CD) strategy

This would accentuate the cultural 'The Process' that seems to have developed and involve principles including:

- Community members as decision makers, and government agencies and non-governmental organizations as supporting resources;
- Actively and aggressively striving to continue increasing comprehensive representation and involvement of community residents;
- Open process;
- Consensus decision making;
- Community members doing as much Program work as possible; and
- Developing community capacity ultimately, to address continuing community environmental health issues in the future.

This analyst recognizes that this strategy in the ideal form is unrealistic, at minimum, because of the responsibilities imposed by law on EPA and CDPHE.

'Just do it'

At the other end of the spectrum, the notion is that the Program Managers essentially would make the decisions they need to make and do what they need to do to meet their legal responsibilities. They would continue to consult with other stakeholders, seeking their advice, and inform them of the decisions that they, the Program Managers, have made.

This analyst recognizes that this strategic approach in ideal form is unrealistic too. At a minimum, the law imposes some requirements on Program Managers for citizen involvement. In addition, Program Managers need at least some support and help, and

certainly not the active opposition, of community groups and leaders in order to implement the remainder of the Program effectively and efficiently.

Tailor and focus implementation

The approach would distinguish the 'soils' from the 'CHP' Program components, and 'weight' each differently on the 'CD' and 'Just Do It' spectrum.

To the analyst, the approach seems realistic and appropriate given the stage of development of each component and the character of the problems they are addressing.

The 'soils' component seems more appropriate for more of a 'Just Do It' approach. The component is:

- Well developed;
- Clearly, progressed well into the implementation stage;
- Tasks are routine;
- Primary tasks require 'big' organizations with 'big' resources to accomplish; and
- After the soils are sampled and remediated the job is finished. (The analyst notes that unfortunately some parcels may not be completed if residents and owners do not cooperate with the Program.)

CHP seems appropriate for a more CD like approach. The component is:

- Less developed, still somewhat formative;
- Not yet routine;
- Some of the activities are suitable for community residents to perform;
- Environmental health will continue to be an issue within the Site and surrounding communities after EPA and CDPHE authority and funding end; and
- Developing the capacity of the community to continue to address environmental health issues is necessary, if community members want to continue addressing these issues in the post-Program future.

The analyst thinks that to some degree, the Program has been beginning to implement this type of approach, particularly since March 2005.

Program Managers have initiated bilateral efforts to obtain the access needed in order to sample soil at parcels where residents and/or owners have not participated yet. The Working Group endorsed this approach at its May 19, 2005 meeting. In addition, the Working Group and sub-group approved and have begun taking a number of actions intended to increase community representation and involvement in 'The Process', and particularly the CHP.

Tactical Tools

Below, the analyst suggests several tactical alternatives for Program Managers to consider taking, within the strategic approach they select.

The tactical alternatives are categorized into four sets:

- Work within 'The Process';
- Improve communication, and community representation and involvement;
- Continue refining information basis for decisions related to Program implementation; and
- Evaluate if Program Managers are using all the tools available as effectively as possible for motivating Site residents to participate in the Program

In order for the analyst to suggest additional action recommendations, and further specify the ones described briefly below, Program Managers would need to decide on the strategic emphasis that they prefer.

Work within 'The Process'

Program Managers should consider proposing any new initiatives to the Working Group for discussion and feedback. They should consider striving to obtain consensus on general principles, including that details will be developed by appropriate (e.g., based on legal parameters, technical expertise, how costs and benefits potentially will be incurred) organizations and individuals. Program Managers would remind the group, in a politic manner, of the legal and administrative parameters within which the Program Managers must work.

The recommendation may be moot, as the EPA Site Program Manager does not anticipate any more new initiatives during the implementation remaining.

Improve communication, and community representation and involvement

Proactively facilitate and maintain relationships among stakeholders

This would involve periodically and informally assessing the perceptions, and concerns of key stakeholders, in addition to within the context of Working Group and other meetings.

Rotate Program related meetings through each Site neighborhood, conduct them in the evening so working residents can participate

Program related meetings include those of the:

- Working Group;
- Community Involvement-CHP sub-group;
- Materials development group; and
- Steering Committee.

The Working Group has endorsed the decision to rotate their meetings through the different Site neighborhoods, contingent on the facilitator and host residents finding suitable facilities.

Program Managers have decided that they are constrained from conducting Steering Committee meetings at other locations other than in downtown Denver, because of their need for Denver Health Department doctors to participate in these meetings. However, they have taken actions in an attempt to improve the potential for Site residents to attend and participate in these meetings.

At the time this report is being finalized, the analyst does not know of any decisions regarding the meeting locations of the other two groups, nor of changing meeting times to the evening for any of these.

Continue efforts to improve and maintain credibility of the Program

The recommendation is intended to respond to the barrier of some community residents perceiving that EPA did not always follow through on actions to which they committed. The Program Managers should consider activities improving outreach and reporting to community residents.

Assessment results suggest a quarterly newsletter to be distributed throughout the Site that would provide up-dated information concerning progress on various Program activities, answering questions submitted by community leaders and residents, etc. One participant suggested a two page newsletter in English and Spanish.

In addition, Program Managers have considered attending neighborhood organization meetings to provide progress reports and answer questions and have taken steps to implement this action.

Conduct outreach and education redundantly because of the rapid and continually changing Site population

The population of the Site appears to be changing rapidly, with high turnover. This suggests that new residents may not be aware of Program related issues and activities, e.g., the problems, solutions, information distributed previously, etc. Nor may they be connected within the network of communication with the neighborhood leaders and organizations involved in the Program. The barrier potentially is exasperated with regard to the Hispanic population, given the language differences and generalized fear of government.

This suggests that Program Managers need to conduct outreach, education, and efforts to involve Site residents repetitively.

Continue refining information basis for decisions related to Program implementation

Continue developing information and analysis

The purpose of the recommendations is to improve the 'targeting' of additional outreach and striving to obtain the highest participation of Site residents in Program implementation. Developing three types of additional information and analysis are suggested:

- Continue identifying and assessing stakeholders;
- Develop maps; and
- Complete the contingency table of individual stakeholders identified with their various affiliations.

Each of these is discussed in general terms below. As stated above, Program Managers would need to make some decisions concerning their strategic preferences in order to focus these recommendations.

Continue identifying and assessing stakeholders using the following:

- Continue identifying potentially influential stakeholders using a 'snowball' sampling technique;
- Continue attempting contact to assess specific stakeholders who have not participated in the assessment; and
- Identify new owners of residential property, i.e., 'gentrification', using other means.

A 'snowball' sampling method essentially would involve contacting the stakeholders that this assessment identified and asking them to identify the stakeholders they perceive as influential. The process would continue through multiple iterations until few or no new stakeholders are identified. The purpose of the recommendation would be to achieve the Program Site Manager's purpose of identifying additional potentially influential stakeholders that have not become known to the Program yet.

A few, obviously key, stakeholders did not respond, or respond favorably, to the multiple attempts to invite them to participate in this assessment. The analyst thinks that these stakeholders would have valuable information to provide that would support the original purposes of this assessment. Given that at least one of these has contacted the analyst in

his role as Working Group meeting planner and facilitator, additional attempts to involve these individuals might be beneficial. The same approach as used to develop this assessment could be taken, or it could be modified if necessary to obtain the required data.

A few other stakeholders were identified by this assessment who seem like they may be influential in neighborhoods and/or groups that have been under represented and involved in the Program. The analyst thinks that these stakeholders too could provide information that would support the original purposes of this assessment.

The analyst has identified these names to the EPA Program Site Manager.

A concern of the EPA Site Program Manager at the time he initiated this assessment was the population change within the Site associated with so called 'gentrification', i.e., individuals of a higher economic means purchasing residential property and doing extensive remodeling and/or enlargement of structures. His concern was that this segment may not be connected and in communication with the historical neighborhood organizations and leaders with whom the Program had been working.

One alternative for identifying this population would be to review planning and zoning, Assessor's Office, and realtor data for Site neighborhoods. An additional source of information for identifying these would be to ensure that the new Community Health Workers of the CHP note obvious new purchases and improvements and contact these residents.

Develop a set of maps, with specific overlays, as a tool for assigning who will contact certain residences and the approach that should be taken. The overlays should include:

- Neighborhood boundaries;
- Parcels of concern and status (e.g., sampled Y-N, results – over or under threshold, remediated Y-N, landscaping completed Y-N, etc.);
- Household characteristics (e.g., owner-renter occupied; children under/over threshold; race and ethnicity); and
- 'Community leaders' addresses'.

Complete spreadsheet matching individual with their affiliations. The spreadsheet identifies the affiliations, e.g., neighborhoods, organizations, events, of the individual stakeholders as identified by the assessment participants. The matrix does not identify every affiliation of individual stakeholders, only those assessment participants noted. (Completing this spreadsheet was beyond the scope of the assessment.)

However, completing this matrix and using it as the basis for additional analysis might benefit Program Managers and their efforts to achieve full participation of Site residents in implementation. Mere examination of the completed matrix might reveal 'gaps' in implementation to date, e.g., neighborhoods or groups within neighborhoods that have not been contacted or involved. Conversely, examination might reveal organizations and

individuals for whom Program Managers should redouble their efforts to contact and involve as they may be the gatekeepers to neighborhoods and groups that have been under represented and involved in implementation to date, with Five Points and Globeville being the obvious examples.

Finally, a complete matrix would provide the required data basis for performing an analysis of 'social circles' or 'cliques' within the Site. This is a mathematical technique that 'shuffles the deck' and would identify, for example, the affiliations in which a relatively large number of individuals connect, and individuals that connect with multiple affiliations. Once identified by the 'clique' analysis, the Program Managers could redouble their outreach and education efforts to target the organizations or events attracting wide participation of influential stakeholders, and influential individuals with many affiliations.

Evaluate if Program Managers are using all the tools available for motivating Site residents to participate in the Program as effectively as possible

Program Managers should consider evaluating if they are using all the tools available to them for maximizing their power within the Program network of stakeholders as effectively as possible.

'Power', as used here, is the capacity to get someone to do what you want. It is the ability to produce intended effects. Thus, it is not unreasonable to presume the Program managers want power with regard to the targeted group, albeit to achieve Program goals and objectives, and specifically get all Site residents to participate in the Program.

The analyst has developed a framework of the 'elements of power in a network of stakeholders' previously. This report does not develop this notion. However, Table 5 presents a set of questions, each of which is derived from an element comprising power in a network. Program Managers should consider applying the questions, perhaps in a workshop of Program Managers and supporting agency staff, in order to evaluate if they are using all the potential tools at their disposal as effectively as possible in order to maximize their capability to get Site residents to participate in the Program.

Table 5
Questions Addressing Elements of Power In A Network

FORM AND DEVELOP RELATIONSHIPS

1. Does EPA have relationships with the target group? (Who is the target group – just residents, or owners and others?)
2. Has EPA maintained these relationships?

EXERCISE DOMINION

3. Does EPA have sanctions that it is not using to obtain compliance?
4. Does EPA have credibility that it can and will use sanctions?
5. Is the targeted community responsive to these sanctions?
6. Does EPA have rewards it is not using?
7. Does EPA have credibility that it can and will provide rewards?
8. Is the targeted community responsive to these rewards?

EXERCISE INFLUENCE

9. Has EPA established communication channels with the targeted population?
10. Has EPA transmitted information consistently to the targeted population?
11. Has the targeted population received, decoded, and interpreted the information?
12. Has the information altered the targeted population's actions from what they would have been had the information not been received?
13. Has the information changed the target population's perception of action (or non-action) and consequences?
14. Has EPA facilitated the opportunity for multiple exchanges?
15. Has EPA transmitted the information in a shared language, whose words and symbols are understood by both actors?
16. Is EPA and the information it distributes seen as credible?
17. Is EPA seen as trustworthy?
18. Has EPA framed information so as to be compelling?

EXERCISE POWER OF POSITION IN NETWORK OF VB-170 ACTORS

19. Has EPA formed coalitions with other powerful actors within the community? Powerful actors would have rewards to distribute, sanctions to impose, be 'influential', be located in a central position in the network of relationships.
20. Has EPA inserted itself into a central position in the community's network of relationships?
21. Is EPA providing resource on which VB-170 actor(s) are dependent?
22. Are there actors within the VB-170 network who are opposing EPA, whose power (absolute or relative) EPA may want to decrease?
23. Has EPA formed relationships with other powerful actors outside the community, enabling it to bring in additional resources?

Analyst presented an example approach at conclusion of presentation to Program Managers

At the conclusion of the May 26, 2005 presentation, the analyst presented a simplified view of the Site, its neighborhoods, and some stakeholders and their relationships to illustrate an approach that Program Managers could consider taking under the 'tailor and customize' strategy.

The approach was built around the assessment results that identified specific individuals who appeared to serve as 'bridges' or 'boundary spanners' between groups and individuals whose relationships are well known to be in conflict.

The illustration suggested that subsequent implementation activities could attempt to work through these individuals in order to access the wider groups with whom they are affiliated, while minimizing the potential for triggering the pre-existing conflicts in the implementation activities. The illustration focused the view of additional data that would be required to take the approach throughout the Site, as the exercise made obvious that the assessment to date did not identify analogous conflicts and 'bridges' in all Site neighborhoods or for all groups. It is possible that the Program Managers and supporting agency staff could fill in these gaps through discussion amongst themselves, as compared to needing additional data developed.

The group discussed the presentation and considered the strategic alternatives. The discussion seemed to begin focusing on the relative benefits of pursuing the 'bridging approach' as compared to relying on community leaders participating in the Program to date and the CHP Community Health Workers for contacting and involving Site residents that have not yet participated in the Program.

By the time the meeting broke up, the group did not seem to achieve a consensus regarding the strategic approach that they thought would be most effective.

APPENDICES

APPENDIX A

POTENTIAL BARRIERS TO PROGRAM IMPLEMENTATION

Context

Community is composed of multiple racial and ethnic groups

The community is multi-racial and multi-ethnic. Differences exist in the language and cultures of the different groups.

"There are big cultural and language barriers to getting information around. Many of the Hispanics in the community neither speak nor read English. This is NOT a problem, but a challenge to make sure they (non-English speaking) get the information and participate. The challenge is for the Program to reach these folks."

One participant wondered if white Anglos within the Program site are getting 'the message' given that they are a small minority.

Large population moving in and out of the community

The community is perceived as having a large and rapid turnover in residents. One implication is that new folks coming into the neighborhood may not be aware of the problems, solutions, information distributed previously, nor connected within the network of communication with neighborhood leaders and organizations.

Potentially, the barrier is exasperated within the Hispanic population by the language and fear of government barriers.

Lack of 'togetherness' and communication in the community

The notion seems to be one of an area consisting of a number of subgroups or clusters that are not connected by communication relationships with one another, including community leaders and other influential actors.

"There is not much 'togetherness' in the neighborhood generally".

The community is not used to being involved in community projects.

"The Cole neighborhood seems to show little interest in community activities".

Communication among residents (really lack of) in the neighborhood, and between people giving the information and the residents is all part of the problem.

It took a while to get the Spanish speaking citizens involved.

The analyst toured the Program site and observed that it is fragmented physically with several significant geographic barriers, e.g., the Interstate highways, railroad tracks, and industrial areas, separating the different residential neighborhoods from one another.

World views' of different groups may differ

Black and Hispanic 'world views' may not fit within 'establishment world view'

"Everyone's issues are so different. Why you are you doing it? Blacks don't think you will. Hispanics are afraid, and won't reveal themselves".

Hispanic health issues are different. Many do not go to doctors, but do lots of self healing. One participant noted her perception that the different groups seem to have very different perceptions about what constitutes a clean home.

Community members, scientists, and program staff may have different perceptions about risk

On some issues, the perceptions of neighborhood residents have differed with those of the scientists involved in the project. One historical example is the sampling method, and particularly the threshold for lead contamination that has been used to identify residential properties for soil removal and replacement.

The analyst notes that the definition of this issue could be elaborated to distinguish neighborhood residents, scientists, and agency staff acting within the parameters of the CERCLA Program, and the recent example of how to identify properties for lead paint abatement.

Some neighborhood residents are perceived as thinking that they have a higher incidence of cancer than other Denver neighborhoods. Apparently, according to scientists, the data does not support this perception. Health professionals think that the probable cause for high lung cancer rates specifically is the high percentage of tobacco smokers.

Some community groups and individuals focus on other issues

Some community groups may hinder progress by focusing on issues that do not directly pertain to the VB-I70 cleanup, yet expect results from EPA and the cleanup team. One example is the proposed redesign of I70.

The analyst speculates that the root of this issue is that to some degree, some community members may have a monolithic perception of government. Another contributing factor might be the 'VB-I70' name. The analyst wonders about this given that one potential participant in the assessment seemed to think that this was the project motivating the study.

Some community members may distrust government

The comment was made in the context of fear of government generally. Mistrust was mentioned as a potential barrier to program implementation, particularly with regard to Blacks and Hispanics in the Program site.

One source of mistrust for Hispanics, in addition to fear of government generally (i.e., based on experience in some of their native countries), is the issue of illegal immigration and the Immigration and Naturalization Service specifically.

One source of mistrust of government, if not fear, for Blacks, appears to be a result of the government's historic role in discriminating against and not protecting members of this race.

The analyst speculates that mistrust of government may not be limited to minority groups.

An additional source of initial mistrust may be because some of the individuals active in the Program, more so with the government agencies, but even with the community groups, are not 'close' with some in the community.

One participating site resident noted that although she lived in the community, given that "... she is a non-Spanish person, she doesn't really sit in these groups". Another noted the apparent lack of Blacks and Hispanics in 'high positions' at EPA.

Lack of involvement by local elected office

"There is a missing link. We haven't had a lot of participation from political leaders, i.e., local -- NOT Congresswoman DeGette's office."

Congresswoman DeGette's Office is the exception. They have been involved, and generally have sent someone to meetings. They sent someone generally to every meeting.

The Council person from Globeville wouldn't even return calls.

The analyst speculates that given that multiple Council districts overlay the program site, perhaps the program site in any given Council district is a relatively small portion. This may be exasperated by the fragmentation of the Program site by geographic barriers, e.g., Interstate highways, railroad tracks, industrial development.

Conflict among some neighborhood organizations and individual activists

Conflict among some neighborhood organizations and individuals exists, including independent of and prior to Program initiation.

Level of educational attainment

Generally, the level of educational attainment of residents throughout the Site is not high.

Related to this is that many residents do not read or speak English.

The notion implicit in the perception of these factors as a barrier seems to be that it might be more challenging for the Program staff to develop information that is effective for communicating with some neighborhood residents.

Whole Program

Communication among stakeholders involved with the program

Shift of bulk of current Program activities from EPA to Denver Environmental Health

Some of the job of relating to the community has shifted to Denver Environmental Health. There has been a transition, but there was some confusion in this transition, e.g., especially over soils removal.

Drop off in communication with EPA, Lack of Working Group Meetings

We're not having Working Group meetings any more. There is still a need for monthly meetings for the different groups to work together!

"In general, relating to CEASE, we'd have people named to be involved in the process. They'd (EPA) call a meeting when they'd need it -- but it seems like they haven't kept in touch with CEASE. It seems like CEASE needs to reinitiate contact, pull them (EPA) back to the table."

"Commitments were made that we would fully participate in development of the Community Health Program (CHP). The group stopped having the monthly meetings after the clean-up started. Once these stopped, we felt left out."

"We need this. So much of our work comes out of this group. We can't be the go-between with the neighborhood without these. We were very unhappy that meetings stopped and that the contract was given to Denver Environmental Health with no consultation with us. We were PROMISED that we would have a significant total role in developing the CHP. This was completely taken away. We had no role once this was contracted. This was a breach of promise."

"Thus, we petitioned Victor (Ketellapper, EPA Site Program Manager) to start monthly meetings again. To his credit he is reinstituting these. This is it. This will solve it. Problem occurred when the working group meetings went away. You know what its like, like when talking about a friend about something for a long time, then they stop talking to

you about it! For us, the CHP was the biggy. That's when it got bad, when we all stopped talking."

The analyst notes that Working Group meetings began again, every other month, in January 2005. Since then, community members expressed their concerns that community representation and involvement in the Program, and CHP in particular, still were insufficient. These concerns were expressed in conjunction with and at the March 31, 2005 Working Group meeting. The participants also attempted to identify and consider a number of specific actions that would hopefully resolve these issues. A subgroup of community leaders, CHP Coordinators, and EPA and Colorado Department of Public Health and Environment Community Relations staff met on April 7, 2005 to consider and decide on 35 specific action items intended for improving community representation and involvement. One outcome of this meeting was formation of a 'Community Representation and Involvement - CHP Subcommittee' that would meet and have a telephone conference call once every month. At the time of this writing, the first telephone conference call that the group scheduled did not occur. The first meeting the group scheduled is planned for next week, May 12, 2005.

The analyst notes that the purpose and structure of the Working Group (e.g., process, membership) seems to have changed during the course of the Program, and specifically the designated roles of members of the community. The impression is based on his new role as the planner and facilitator of these meetings and review of some of the minutes of the earliest meetings when the Program began and the Working Group was formed.

Program Steering Committee Isn't Aware of What the Working Group Is Doing

The notion seems to be that one community participant perceived a 'disconnect' between the Program's Steering Committee and the Program's Working Group. She thought the Steering Committee wasn't aware of some of the work developing and editing CHP materials that residents and CHP staff had done previously - on which they felt they invested considerable time. In addition, she perceived Denver General staff, who are participating in the Steering Committee, but not the Working Group, as not availing themselves of information that Northeast Denver Housing Center had developed previously and duplicating that effort too. Part of the problem was thought to be the fact that the Steering Committee had members who were not participating in Working Group meetings.

Since this interview was conducted, community residents have elaborated their concerns about the Steering Committee in the context of the Working Group meetings, and have asked for Steering Committee meetings to be conducted within the Program Site and open to the public.

Problems in getting community involvement

Getting the right actors involved

'We're concerned about getting full participation for the soil testing, soil clean-up, and the community health education/testing programs. We need the community leaders' support in that this is a good thing and build trust for this project.'

'We need to have the support of several key groups and people.'

EPA has worked with a number of groups within the community, but these may not be the only leaders that residents go to for information or get direction from. We need to identify these additional community leaders.

"There must be others, for example, the churches, religious groups. Recently we worked with Head Start and Day Care Centers, but not as much. We need to identify where people get their information, make sure they are aware of the Program, and perceive it as a good thing. We're into implementation now. We need people to buy in."

'We can do meetings, talk to who is there. But not many people engage. Many seem OK with the folks doing it, but maybe not all are totally.' 'Some folks are the 'gatekeepers', maybe there are others and we're not getting to them?'

Meetings have been conducted, many were not well attended

Agency participants noted that they had scheduled several meetings in the neighborhoods, and that, although a few were well attended, many were not.

Little interest in community activities

One participant noted that her community is not use to being involved in community projects and that the neighborhood seems to show little interest in community activities.

Conflict among community stakeholders

If you have a meeting with some stakeholders, others won't come.

We don't want to motivate conflict. We're concerned that if we try to bring them all together, that would cause conflict.

Need for additional involvement in specific neighborhoods and groups

Different participants noted a need for additional involvement of residents in Swansea, Globeville, and Five Points.

'Five Points is an area that needs a lot of support and work. Few people know much or anything about the site.'

Some participants noted a need for additional participation in the Program by Black residents of the Site.

Considerable effort is required by site residents to stay involved

The notion seems to be that many residents work full time, are working at being parents, have been sick, may have felt like their work was not appreciated or used, or just 'burned out' on the effort required to stay involved. Their work on the Program is voluntary, in their spare time.

An agency participant recognizes this, noting, "We have people, community members, who have invested time, for which they are NOT paid. Some have put 100s of hours into this.

'I have been able to attend more meetings than most residents, and have found it difficult to stay on top of things. So it must really be hard for other residents to stay on top of the issues.'

She explained how she started a job in the afternoons and wasn't returning telephone calls for a couple of months, including even to CEASE, her organization.

Communication is the main thing. From her perspective, her financial situation has come to a bad spot. She's doing lots of volunteer work. She's stepping back. "I can't put energy into something that is not being used." (Specifically the brochures, also finding out the big role Denver General has in it, that they aren't using the brochures, and are also starting and using their own system.)

'One problem I see for myself, our community organization and our community is the time and energy needed to have EPA follow-through with its commitment.'

Credibility of the Program

Residents sometimes feel they need to 'dog' EPA on matters – lack of follow-through can hurt EPA's credibility

Some site residents feel that they need to spend a lot of time to 'dog' EPA, i.e., monitor them carefully and persist in bringing things to their attention and to find out if EPA followed through with what they agreed to do. The analyst notes that the credibility of any of the Program Managers could be hurt, where and if this were to occur.

"One problem I see for myself, our community organization and our community, is the time and energy needed to have EPA follow-through with its commitment. It would have been nice where EPA agreed to do something, if they'd come back and shown progress in implementing that."

'The 'Kids at Play Survey' is one example. The Working Group considered high lead levels in the blood of children potentially a big problem and expected to get results from this survey. The survey was taken two to three years ago. What is the status? Results are not available to help the Community Health Program component.' (The analyst notes

that a progress report was given about this project at the Working Group meeting conducted 3/31/05.)

Table 2 lists eighteen (18) questions the assessment identified that community residents had for EPA regarding different components of the Program. Many, but not all, of these have been addressed during the course of the assessment, in part because the analyst communicated these to the EPA Site Program Manager and he tried to respond.

Blacks are skeptical

One participant comments, "Everyone's issues are so different. Why you're doing it? Blacks don't think you will."

Skepticism exacerbated by characteristics of Program staff

People in one neighborhood 'were not satisfied' with the 'Kids at Play Survey' effort. The community participant who noted this 'thinks it was because it was all college kids, but not Spanish speakers. The college kids were seen as thinking they were above us, not real neighborhood people. They were not received as well.'

Community residents don't understand why it took so long to hire the CHP staff

The analyst notes that it is possible that the period of time in which it took for the CHP to be put into place, coupled with the several month absence of Working Group meetings and other deficiencies in communication between Program Managers and site residents, also hurt Program credibility.

"The Promatoria thing -- we don't see why it's taken all this time!"

One community participant, referring to the Steering Committee meetings said, "If you go to those meetings, you see why things take time. But CEASE is not seeing this."

Duplication of effort -- agencies duplicating what citizens and neighborhood organizations have done

The analyst notes that Program credibility, and certainly citizens' motivation to continue investing time and effort in the Program, may be hurt if they see their efforts not being used or valued.

"I can't put energy into something not being used, specifically the brochures. Also finding out the big part Denver General has in this, that they aren't using the brochures. Also that they are starting and using their own system up again. North East Denver Housing has its own program, has done this, also is testing people. These two programs are not being coordinated. These people are not able to communicate."

Information and methods that are not perceived as realistic or plausible can hurt Program credibility

Community residents do not understand why some properties exceed the threshold enabling their contaminated soil to be removed and replaced with new soil, given that the distribution is apparently so haphazard.

Why is my next-door neighbor getting cleaned, but not me? This is across the whole site. We don't understand, and neither does EPA. Distribution of the contamination pattern is insane. This is the weirdest distribution pattern anyone has seen, and there has been no explanation. Neighbors don't understand how contamination can stop at a property line.

A more recent example, about which some controversy has begun, is the method proposed by the Program Managers for determining if a property will be eligible for external lead based paint abatement. Residents and their technical advisor have objected to the proposed method on the grounds that that it seems contrary to what might be expected in reality.

Differences in perceptions among community residents, scientists, and maybe Program Administrators

"One issue is checking to make sure what the scientists think matches what the residents affected think. Residents may not agree with everything, but if not, then we'll need to hammer it out."

The Program needs to develop a mechanism for coming to agreement for these cases as they arise. For example, the Program is trying to test all children under 6 years old for lead contamination, but they won't turn someone away if they want to be sampled.

The analyst notes that the perceptions of staff responsible for administering the Program may differ from the other groups too. These differences may be a result of the legal, regulatory, and administrative constraints imposed on implementation. One example of this may be the current controversy about the method proposed for determining eligibility for external lead based paint abatement.

Inaccurate and inconsistent information distributed in the past

Some participants suggested that inaccurate and inconsistent information was presented during a past public meeting. Providing inaccurate and inconsistent information will hurt Program credibility.

Perceptions and/or representation of who is a member of a community organization by others may differ

EPA and other agencies have accepted, or at least listed, at least one person as a member of a particular neighborhood organization, whereas the organization does not consider this person a member. EPA and its partners should respect other groups' decisions regarding how they define themselves, including their membership and how they work.

Program design

Scope of work

The Program has 'gaps' in it from a perspective of the comprehensive risk of lead contamination to human health. The issue is the risk from lead contamination comprehensively and the degree to which the Superfund Program can, and cannot address this.

'Some lead issues fall through the cracks'.

"Potentially, the Program has raised unrealistic expectations."

A recent controversy centers on how to use Program resources to address the potential risk from external lead based paint, and specifically the controversy of how to qualify residences for external lead based paint abatement.

More recent, and related to this, is the issue of 'hot spots' identified in yards by North East Denver Housing Center, where the yards do not exceed the threshold enabling soil removal and replacement calculated using the method the Program has been using.

Planned end date

Another currently controversial issue is EPA's planned Program ending date of September 2006.

One participant stated that early in the Program planning stage, that EPA had discussed funding the Community Health Program (CHP) component for as much as ten years, then later, for three years. He contrasted this with the current situation where the CHP really is just getting off the ground, resulting in an effective duration of only approximately eighteen months.

'Yeah, that's what I'm communicating. Maybe on a broader level of trying to develop the community health plan as originally presented. The job they are doing is a benefit to the neighborhood. But -- we want the CHP to leave the neighborhood in a good position to move on.'

End of funding from EPA

Community members are leery of future funding cuts. Agency Program staff expressed concern too. The issue is one of uncertainty and focuses on funding -- i.e., what happens if and when EPA's funding is no longer available. Will the efforts up to that point be all for naught?

'Denver Environmental Health -- they are reluctant to commit to longer than EPA will fund.'

'If EPA's funding dropped out, then is all for naught?'

Administration

Coordination

Coordination was framed more as an anticipated challenge, rather than a current problem.

Potential for 'triangulation'

Some participants expressed a 'fear of triangulation', i.e., that some groups may approach EPA on a one-on-one basis to get approval to perform a function and/or obtain resources to conduct an activity related to Program implementation – and not going through 'the process', i.e., the Working Group. The concern was expressed more for conduct of the CHP rather than the other Program components.

Some confusion seems to have occurred with the recent initiation of the CHP and role of Denver Environmental Health

Some of the job of relating to the community has shifted to Denver Environmental Health. There is a transition, but there has been some confusion in this transition, especially over the soils removal.

Need to coordinate the two programs testing blood

Apparently two different programs are testing the blood of children. One participant noted this, and the need to coordinate the two so that one is not duplicating the effort of the other.

Need to coordinate lead based paint abatement programs of others with EPA soils clean-up

One participant noted that if the program she administers to address internal lead based paint finds that lead is an issue, then they need to ensure coordination with EPA and their soils testing and clean-up in each specific case.

Need to coordinate at outreach events

Participants representing different agencies and organizations conducting related programs identified a need for them to coordinate the presentations and materials they may distribute at outreach events throughout the neighborhoods of the site. The notion seems to be one emphasizing in particular the need for the information from the various groups to be accurate and consistent, and secondarily, minimizing duplication to be efficient with scarce resources.

Not enough site residents and businesses have been hired to conduct Program work

"Probably they could have contracted more out to community groups, e.g., the neighborhood groups, who probably would like to do more of the work and get paid for working in their community."

Slow pace of bureaucratic process

The notion is that Program implementation activities have moved slowly. In particular, the slow pace of CHP implementation was noted by participants.

The analyst speculates that the time that it took for EPA and DEH to get the CHP in place may be responsible, in part, for site residents perception that they were 'cut-out' of the CHP development process.

Denver Environmental Health had internal organizational challenges. This is not EPA's fault. It is a knock against 'The System'. We were required to get several officials', including Council's, to get a coordinator hired and in place. The City doesn't make it easy to accept funding or hire new staff.

We're getting pretty far along in planning and agencies are now stepping up to the plate. It just takes time. Now we're moving. Lots of meetings and is time required, some technical issues of who and how to test needed to be resolved.

I realize that although we may not see results, a lot of time is spent waiting for other groups, such as City Council, to complete the necessary processes.

Hiring of the Promotoria is one big thing -- we talked about this long ago in CEASE Working Group meetings. EPA or other groups sent representatives. We decided the best way was to get people from the neighborhood.' (i.e., hire them) She knew there would have to be lots of "behind the scenes" regarding who gets paid how much and other issues. This is not seen in the neighborhood, or even in CEASE.

Soil Sampling, Removal, and Landscaping

Soil sampling and replacement does not seem to motivate the interest of community as much as setting clean-up threshold did

The process of getting properties sampled and contaminated soils removed and replaced does not seem to be motivating the interest and involvement of community residents as much as did the issue of setting the threshold for enabling soil removal and replacement to occur.

'People are not getting tested. Program site residents are not interested in doing soils.' One participant feels that it is the people who don't trust government who are not getting tested. He's been told this by about five or six different residents.

Soil removal, replacement, and landscaping has some problems

Concrete etc. damaged from clean up

Concrete was damaged from the heavy equipment used in the clean-up, including public sidewalks and private sidewalks and patios.

Home foundations damaged from clean- up

One participant wonders if the clean-up didn't damage the foundation of her home and cause her basement to flood.

She said that the clean-up also dug-up "crock pipes", which she didn't know were there.

The analyst wonders if the 'crock pipes' weren't a French Drain' that had been draining ground water away from the home.

Rocks falling on sidewalks

Rocks are falling on sidewalks.

Some of the residents are having rocks brought to replace soil, rather than sod. The rock is ending up on sidewalks, rolling onto the sidewalks. EPA was going to talk to the contractor about this.

Fences damaged from clean up, some not replaced properly

Clean-up damaged some fences. Some fences were not replaced correctly.

One woman, not a participant in the assessment, complained that they didn't put her fence back, although it was "goofed-up" anyway. She didn't talk to EPA about this. She said she got disgusted with EPA, and didn't want to deal with them. She got sick, and couldn't afford to get upset with them.

Sprinklers were not put back correctly, some owners had to pay the cost

EPA contractors didn't replace sprinklers correctly. Home owners had to pay the cost.

I was told Dean's Sprinklers were going to fix what EPA couldn't. One of the EPA workers told me about Dean. I hired Dean's Sprinklers because of that, thinking you OKed them. Turns out they said they were never hired by EPA. I didn't get any other estimates. I wanted someone I could trust. My system cost \$2,600!

Landscaping

Lack of xeriscaping or drought resistant landscaping, lack of outreach and education about xeriscape

Over the summer, through different Working Group meetings, EPA had a goal to reduce Blue Grass lawns by 50%. I haven't seen the overall pattern, but it seems that very little of this has happened.

He thinks there is a choice of bark or rock but that the problem may be that many people are not versed in xeriscape and that the work may be more in the hands of the contractor whose process is quick.

The Working Group never requested the Denver Water Department's Water Conservation Program to get involved.

I'm waiting to hear from EPA on the issue of xeriscape.

Many replaced lawns died

The other problem is so much of the installed Blue Grass has died. Many residents may not have time to water intensively. It seems like there was a commitment to improve the neighborhood in the process of removing and replacing soil and landscaping, but I haven't seen much with regard to the lawns.

Elderly and disabled can't make it to the landscaping store

Many of the residents are elderly. They were just given a voucher (i.e., for landscaping materials). Many can't make it to store. EPA agreed that they could call and they'd call a contractor to do it. I haven't heard back from EPA on this. Maybe this is being done one on one.

Not enough thought was put into the landscaping, the neighborhood doesn't look professional, and some residents have incurred significant costs

EPA should have beautified the neighborhood better, not just done sod.

A landscaper was hired by EPA. The landscaper looked at a yard, and guessed what they took out. Then they gave an estimate to replace what was there, and told the residents to go to the nursery to pick-up the materials. Residents got checks to pick up what they were replacing. His estimates were ridiculously low, and lots of people forgot what they had and didn't get it covered.

The landscaper was from Mississippi, and didn't know things here. He told us to go to Home Depot.

Not enough money was given to buy the plants.

I liked where they sent us, it was lovely, but so far that everyone had to get trucks to get them.

I paid a man with a truck to get my plants, and hired and paid someone to plant them.

A neighbor would have loved to get them. We could have gotten a neighbor to do it if he got paid. We would have liked to see some minorities, and would have liked some door-to-door folks.

Water bills went up and watering permits were taken

Most people's bill went up more than others if they had their soil removed.

Will they (EPA) do anything about the water bill? The bills are much more than they thought.' Examples were given of \$69 and \$270 per month. The latter was a widow on a fixed income.

When the City cut back on water last year and this year, they did not know they would lose money. The fixed income people can't pay double for their mistakes. A grant should be given to Denver water, so we can water our new lawns.

At least one person's water permit (i.e., to water during restrictions imposed during the drought) was taken, long before she thought it would be taken.

"I watered every day, until my water permit was taken by the EPA at the end of July. I thought it was mine until December 31, '04. Someone came, said she was from EPA, and DEMANDED to have my permit. She was very nasty. She said they would pass it around. She showed an ID after she demanded the permit. It had EPA on it. She drove a Mercedes. This happened at the end of July."

Then this person had to go back to Denver Water Department restrictions. The person didn't want to loose their new grass, so snuck watering. 'Other neighbors who followed the Denver Water Department restrictions -- their grass burned up. They were on the EPA project. Some lawns came back, some didn't.

Community Health Program

Problems perceived pertaining to CHP are similar or same as some for program as a whole.

Lack of community involvement in Community Health Program (CHP) development

"We (CEASE) think that problems could arise because community representatives have had so little opportunity to help shape and decide where, when and how the community health plan will be developed: i.e. what was included; what was excluded; what the goals and objectives are; who will implement what parts; and, most important to us, how community representatives and other people will or will not be included in detailed planning, decision making related and evaluation-of the project."

"Commitments made that we would fully participate in development of the CHP. The group stopped monthly meetings after clean-up started. Once this stopped, we felt left out."

"The CHP was not established yet when monthly meetings stopped. EPA started the clean-up. Then EPA contracted out the community education to Denver Environmental Health. Denver Environmental Health had a series of meetings at the family center in Globeville. All we did was look at materials that would be appropriate to hand-out. Bilingual women would go door-to-door, two knocks per door. After that, we were blocked out of the process."

"Gloria Schearer did go to meetings. But, she is only one person. And the meetings were downtown, at the Webb building, during the day, difficult to go to, and expensive to park. We know nothing about CHP except what the pamphlets are. We don't know what they'll do, or how they'll evaluate what they do".

"We were cut out of loop after meetings stopped. This was totally contrary to how we worked."

"Thus we petitioned Victor to start monthly meetings again. To his credit he is reinstituting these. We need this. So much of our work comes out of this group. We can't be the go-between with the neighborhood without these. We were very unhappy that the meetings stopped and that the contract was given to Denver Environmental Health with no consultation with us. We were PROMISED that we would have a significant total role in developing CHP. This was completely taken away, we had no role once this was contracted-out. This was a 'breach of promise'."

"Everything else has gone so well. We were full partners in everything else from the very beginning. Then we were totally excluded from the CHP. This was totally opposite from before."

"The second is tougher. We and our technical assistant, Dr. Kosnett, must be fully involved in developing and planning the CHP. They gave us their word that we would be!! It will be fun! We disagree, go back and forth, but it is all respectful, and good. The process has never been personal to this date. Issues are on the table, we speak to the issue. You should come. I'm not worried that it will be contentious. I'm glad we'll talk about it."

"This is it. This will solve it. The problem occurred when the Working Group meetings went away. You know what its like, like when talking about a friend about something for a long time then they stop talking to you about it! For us, the CHP was the biggy. That's when it got bad, when we all stopped talking."

CEASE had lots of involvement in developing CHP before I was involved. Now that the CHP resides with Denver Environmental Health, CHP is a step removed from true grass roots.

The analyst notes that Working Group meetings began again, every other month, in January 2005. Since then, community members expressed their concerns that community representation and involvement in the Program, and CHP in particular, still were insufficient. These concerns were expressed in conjunction with and at the March 31, 2005 Working Group meeting. The participants also attempted to identify and consider a number of specific actions that would hopefully resolve these issues. A subgroup of community leaders, CHP Coordinators, and EPA and Colorado Department of Public Health and Environment Community Relations staff met on April 7, 2005 to consider and decide on 35 specific action items intended for improving community representation and involvement. One outcome of this meeting was formation of a 'Community

Representation and Involvement – CHP Subcommittee’ that would meet and have a telephone conference call once every month. At the time of this writing, the first telephone conference call that the group scheduled did not occur. The first meeting the group scheduled is planned for next week, May 12, 2005.

The analyst notes that the purpose and structure of the Working Group (e.g., process, membership) seems to have changed during the course of the Program, and specifically the designated roles of members of the community. The impression is based on his new role as the planner and facilitator of these meetings and review of some of the minutes of the earliest meetings when the Program began and the Working Group was formed.

Disappointment in performance of some staff

This issue has been rectified.

CHP start was delayed, now the duration planned is significantly shortened

The CHP will actually function for less than two years, given the delays in finally beginning the program during the last months of 2004 and its planned ending in September 2006. This is significantly less than the minimum of three years to which the EPA committed and the ten year program the agency discussed originally.

Slow pace of implementation, need to keep pressure on DEH

A neighborhood resident felt that citizens ‘needed to keep the pressure on Denver Environmental Health’. He says things were slow this summer (i.e., progress with CHP implementation), lots of legalese back and forth. Denver Environmental Health -- They are reluctant to commit to longer than EPA will fund. He says over all they’ve done pretty good.

Slow pace of bureaucratic processes.

Denver Environmental Health has had internal organizational challenges.

This is not EPA’s fault. Victor is doing all he can.

This is a knock against the system. Must get Council approval etc., to get a coordinator hired and in place. The person is not hired yet.

The City doesn’t make it easy to accept funding or to hire new staff.

We’re getting pretty far along in planning and the agencies are now stepping up to the plate. This just takes time. Now we’re moving. Lots of meetings and time are required. Some technical issues of whom and how to test need to be resolved.

I realize that although we may not see results, a lot of time is spent waiting for other groups, such as City Council, to complete necessary processes.

Hiring of Promatoria is one big thing.

Things were slow this summer, lots of legalese back and forth.

Don't understand why it took so long to hire the Promatoria and other CHP staff.

Need to coordinate two programs testing blood

We don't need to do the same thing twice.

Kids at Play (another program) has been testing all kids. They tested 100% of the 6 year old and younger kids. U. of Colorado Health Sciences Center did the testing, EPA and ASTDR funded it. Now Denver Environmental Health says they will test again? Why? Why are you paying again? Where are the results from the previous study?

APPENDIX B:

'GOOD THINGS' ABOUT PROGRAM IMPLEMENTATION

Context

Site has many existing neighborhood organizations that are potential resources to Program implementation

The notion is that the neighborhood organizations existing at the time the Program was initiated, and developing since, are an important resource to the Program implementation.

They're the ones who get folks out, get a small group of people who are concerned, willing to put time in.

We'll go to those folks and they'll go to their neighbors. We get the letters out.

They're like the caretakers. They can get the community out to take action.

Each of these groups has members who could participate in meetings, identify questions and/or concerns, recruit volunteers when needed, and could share information within their own community.

CEASE and its leadership are an important resource to the VB-I70 site, as they brought experience from the previous Globeville Superfund clean-up.

"Our role is to participate in every aspect of all work related to VB-I70. We sat at the table in monthly Working Group meetings for all the years of the project, through the remedial investigation, then the feasibility study for setting the clean up levels. We don't just listen but are involved. We teach people about the community, advocate for the community. We opposed the initial clean up levels proposed as we knew that lower levels were more appropriate based on health data. We work in the spirit of cooperation. We understand win-win, and also that in lose-win, everyone loses. We work to obtain consensus. We as a group continue getting information out to the community regarding what is being done, progress, so keep the community positive about the Program."

Dr. Kosnett was cited in particular for his technical expertise and support of the neighborhoods.

Substantive service organizations serving site neighborhoods

Northeast Denver Housing Center

They provide counseling services for example: first time home buyer workshops; one-on-one counseling to help people get credit, fix credit, get mortgages and reverse mortgages; etc.

They are doing great work at looking at the lead issue and finding an economical way of dealing with the issues. They have a network of contractors and inspectors, and they've done a lot of lead work.

Their leadership is very committed.

I've been in meetings with the Director.

They've been working in Cole.

With a limited budget, they are effective, already have contractors in place, experience, have researched liability issues, and can clean up in an economical way. For example, if kids are playing with paint, they can step right in and clean up. Others, the government agencies, have more bureaucracy and can't just step in.

I feel they've done quality work.

HAND (Healthy Air of Northeast Denver)

Does community based toxics reduction.

Works with community groups to decrease emissions and exposure.

Focus Points Family Center in Five Points;

They see Mexicans and other Spanish speaking people. They are important as they have bilingual folks who can communicate and share information with Spanish speaking people.

East Side Health Care Center;

This is the only clinic in any of the five (5) neighborhoods and the primary health care center for most of the people in this neighborhood. This is a public clinic.

Regular neighborhood events

The recent Fall Festival testing seems to have had an impact on many residents who attended. I have heard good reports as to the number tested and information given.

This was a multi-neighborhood event, held in the streets, at Randolph and Williams. The group putting out lead information was Northeast Denver Housing. They tested children

there, had a booth with information on lead, what was going on in the area, and what Northeast Denver Housing was doing. The event was well attended by people in that area.

Stuff like this seems effective. It draws people. That's why I'm suggesting this.

Leadership Seminars

Sandy Douglas does 'Leadership' seminars, e.g., at St. Martin.

Sandy Douglas and her sister are leaders in the communities where they live. Sandy has decided to bring the leadership out among the people. She's brought neighborhood kids out to help Northeast Denver Housing, to, for example, swab floors and window sills, then test the swabs for contaminants.

Neighborhood churches

Churches have big events.

Our Lady of Grace Church in Swansea is Catholic, and almost entirely Mexican. They partner with others on lots of issues to get the word out to people. With regard to VB-170, they have a 2nd tier involvement, e.g., letting groups make announcements, etc.

Annunciation Church in Cole is Catholic, is virtually same thing.

Neighborhood schools

The schools now have committee members involved in school concerns.

Whole program

Overall good program, good people

Many of the participants said that overall, this was a very good Program, and viewed how it has been conducted to date very positively.

A number of participants expressed positive views about many of the other stakeholders participating in the Program.

"This is a good program, with good people. We have people, community members who have invested time, for which they are NOT paid. Some have put 100s of hours into this. They have the good of the community at heart, although they may have interpersonal and organizational issues. All the stakeholders seem to share the same basic goals, i.e., the good of their community and health of their children."

I thought everything worked out wonderfully, with the understanding that nothing is perfect.

Character of stakeholder/community involvement

There are a million and one positive things. Things are going wonderfully.

The neighborhood meetings that EPA and ASTDR had have had a positive influence he is sure.

The Community Involvement Plan is very good!

The whole process, up to the point when monthly meetings stopped, worked very well. This is the most extensive public involvement of any Super Fund site, and she's been involved in three now. Everything else has gone so well. We were full partners in everything else from the very beginning.

In spite of problems, this was the best effort like this (i.e., Super Fund Community Relations) at any time in this country! Other folks experienced with SF sites are astounded at how good this process is.

There has been no mean spirited stuff, things never got personal. No one has said 'YOU', even when there have been very spirited exchanges. I think everyone would say that.

The whole experience has been positive. We all did a good job, with each did piece. I'm very hopeful that when we come together again in the Working Group, we can come together again in positive agreement around the CHP.

They have made a lot of effort to include everyone.

EPA and Denver Environmental Health have done a good job trying to get the community involved. They tried to make the planning as inclusive as possible.

EPA Site Program Manager

Things are going well now. The VB/170 Program is a class act now. It is efficient, a well oiled machine now.

Victor is doing all he can.

EPA funding

EPA provided funding through the TAG grant process. With that, we were able to hire Dr. Kosnett who does consultant work. This gives us someone on our side to look at proposals from the scientific side and help us understand. With that, I can carry information back from CEASE, where we can inform neighborhood folks of clean up options. This is very much a help, not just to the team, but the whole neighborhood.

Getting Spanish speakers involved, and the Promotoria

Getting Spanish speaking population involved, and Spanish interpreters at the meetings was a big help.

The role of people as minority people is important. By getting Spanish speakers, having translators at meetings, brings out the fact that they are equal people. So they're getting this and they are able to understand as this is in their language.

Reinstituting Working Group meetings

We petitioned Victor to start monthly meetings again. To his credit he is reinstituting these. We need these. So much of our work comes out of this group. We can't be the go-between with the neighborhood with out these.

Citizens participating in clean-up program

Neighbors who participate with the clean-up team can be a valuable resource to contact reluctant participants, distribute information, encourage sampling, or participation in the health program.

Lists – related stakeholders

Others have lists of stakeholders within the Site that the Program could use. One is Karen Kellen who 'collects people', and has a spreadsheet of business and community leaders, elected officials, public interest groups, etc. within and surrounding the Site.

Soils testing, replacement, and landscaping

The clean up for my home and community was outstanding. It was a wonderful blessing, healthwise.

The day the new soil was put down, the out door smell was fresh and wonderful. I had not smelled air that fresh in the almost 50 years I have lived here. The new soil was beautiful. I was told by many how beautiful my lawn looked.

Community Health Program

Outreach Plan

The outreach plan looks very thorough. I applaud the use of community educators to get the word out. It will be interesting to monitor the success of these efforts. What I saw was lots of the same suggestions that I was hearing from the community in there. I thought they did good listening job.

'Community educators'.